



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

**STATE ONLY NATURAL MINOR OPERATING PERMIT**

Issue Date:	November 3, 2021	Effective Date:	June 20, 2023
Revision Date:	June 20, 2023	Expiration Date:	November 3, 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 unless otherwise designated.

**State Only Permit No: 09-00008**

Natural Minor

Federal Tax Id - Plant Code: 23-2050512-1

**Owner Information**

Name: TAVO PKG INC  
Mailing Address: 2 CANAL RD  
FAIRLESS HILLS, PA 19030-4302

**Plant Information**

Plant: TAVO PKG INC/FAIRLESS HILLS  
Location: 09 Bucks County 09002 Falls Township  
SIC Code: 2759 Manufacturing - Commercial Printing, Nec

**Responsible Official**

Name: JEFF TAYLOR  
Title: PRES  
Phone: (215) 428 - 0900 Email: jeff.taylor@TAVOpackaging.com

**Permit Contact Person**

Name: GRANDERSON HANKS  
Title: PLT MGR  
Phone: (215) 428 - 0900 Ext.227 Email: granderson.hanks@TAVOpackaging.com

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



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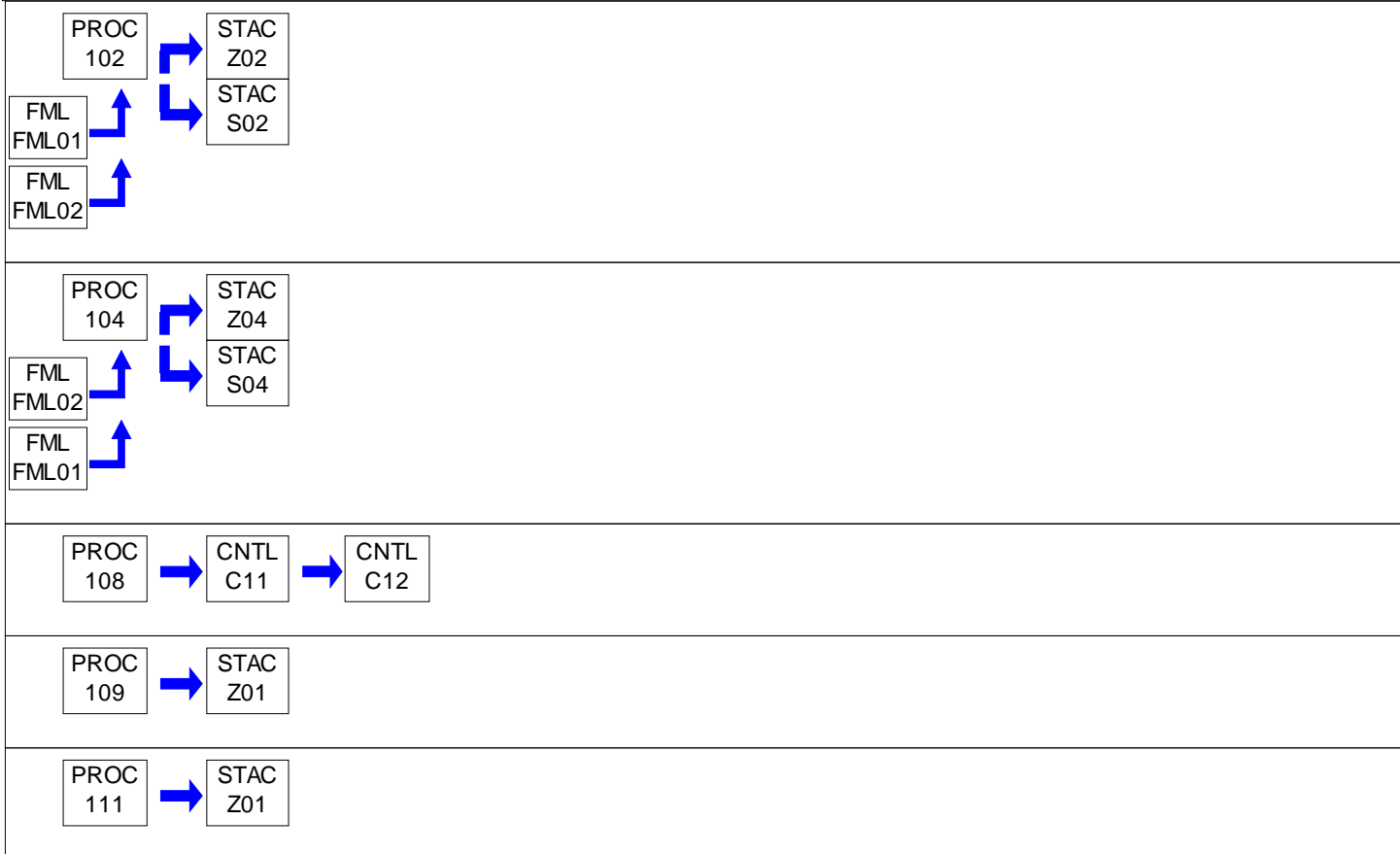
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
102	FLEXOGRAPHIC PRESS 314	48.000 Lbs/HR	SOLVENT
		3,810.000 CF/HR	Natural Gas
104	FLEXOGRAPHIC PRESS 312	48.000 Lbs/HR	SOLVENT
		3,810.000 CF/HR	Natural Gas
105	MISC VOC SOURCES		
108	BY-PRODUCT PAPERBOARD		
109	PARTS WASHERS		
111	KBA 145 OFFSET		
C11	AIR SHARK PAPER RECOVERY (3)		
C12	FILTER HOUSE		
FML01	NATURAL GAS		
FML02	PROPANE		
S02	DRYER FOR PRESS 314 STACK		
S04	DRYER FOR PRESS 312 STACK		
Z01	FUGITIVE		
Z02	PRESS 314 FUGITIVE		
Z04	PRESS 312 FUGITIVE		

**PERMIT MAPS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



**SECTION B. General State Only Requirements**

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations, as specified in 25 Pa. Code § 129.14.
- (7) N/A
- (8) N/A
- (9) Sources and classes of sources other than those identified in (1)-(8) of this condition, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
  - (i) The emissions are of minor significance with respect to causing air pollution; and
  - (ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a) (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.
- (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)(1)-(9) (relating to prohibition of certain fugitive emissions).

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

The permittee shall limit the total VOC emissions from the facility to 20 tons per year or less, based on a 12-month rolling sum.

**# 008 [25 Pa. Code §129.14]****Open burning operations**

The permittee may not permit the open burning of material in the Southeast Air Basin, except when the open burning results from:

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

**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, the most current version of the DEP Source Testing Manual, and the EPA Clean Air Act National Stack Testing Guidance, 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.
- (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).
  - (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:

**SECTION C. Site Level Requirements**

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

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

(d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the 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 (if applicable), 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.
- (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 record VOC emissions from the entire facility on a monthly basis, including 12-month rolling sums.

**# 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.

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

[Additional authority for this 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:

**SECTION C. Site Level 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 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 submit a compliance schedule or fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

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

- (a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- (b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.
- (c) The report shall describe the following:
- (1) Name, permit or authorization number, and location of the facility;
  - (2) Nature and cause of the malfunction, emergency or incident;
  - (3) Date and time when the malfunction, emergency or incident was first observed;
  - (4) Expected duration of excess emissions;
  - (5) Estimated rate of emissions; and



**SECTION C. Site Level Requirements**

(6) Corrective actions or preventative measures taken.

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

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

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

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

**VI. WORK PRACTICE REQUIREMENTS.****# 017 [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 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, or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airbourne 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.

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

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

(b) If an unauthorized modification of any source(s) occurs at this facility, the permittee shall immediately notify the Department. If so directed by the Department, then this permit, as it pertains to the modified source(s), may be suspended and the source(s) shall not be operated until the modification is authorized by the Department.

**# 019 [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 Section A and Section H, where applicable, of this permit, are operated and maintained in a manner consistent with good operating and maintenance practices, and in accordance with manufacturer's specifications.

**# 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 Section A of this permit, is causing the emission of air

**SECTION C. Site Level Requirements**

contaminants in excess of the limitations specified in, or established pursuant to, 25 Pa. Code Article III, or any other applicable rule promulgated under the Clean Air Act.

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (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.

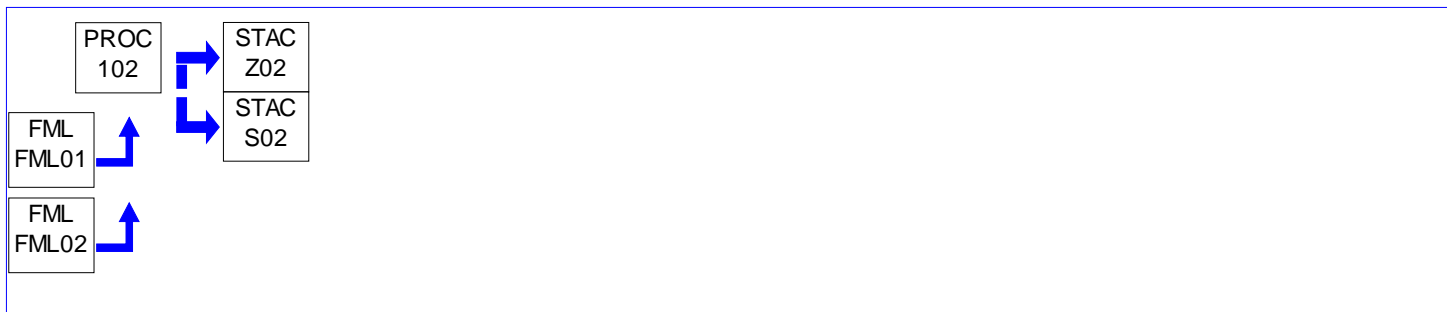
**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: FLEXOGRAPHIC PRESS 314

Source Capacity/Throughput:	48.000 Lbs/HR	SOLVENT
	3,810.000 CF/HR	Natural Gas

Conditions for this source occur in the following groups: FLEXOGRAPHIC

**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.**

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

This printing press contains a drying unit rated at 3.89 MMBtu/hr fueled by natural gas or propane.

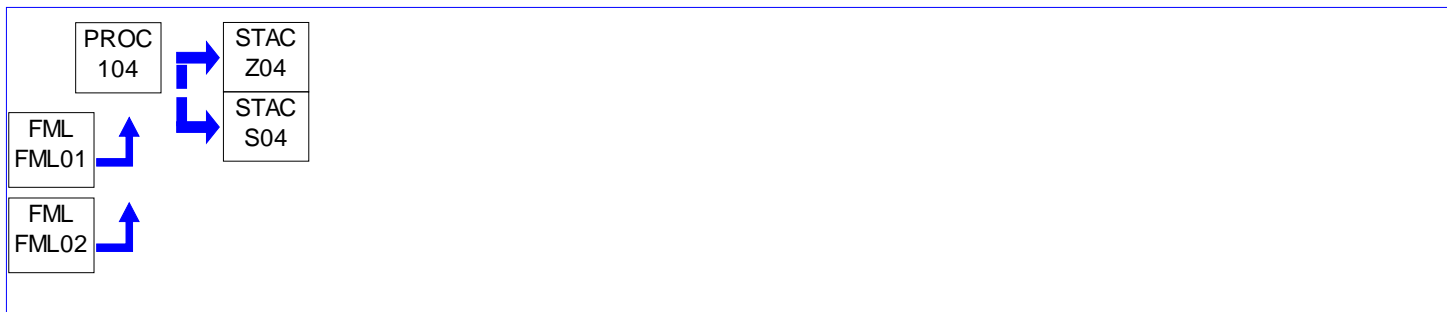
**SECTION D. Source Level Requirements**

Source ID: 104

Source Name: FLEXOGRAPHIC PRESS 312

Source Capacity/Throughput:	48.000 Lbs/HR	SOLVENT
	3,810.000 CF/HR	Natural Gas

Conditions for this source occur in the following groups: FLEXOGRAPHIC

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall limit VOC emissions from this source to 10 tons per year, based on a 12-month rolling sum.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (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.**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

This printing press contains a drying unit rated at 3.89 MMBtu/hr fueled by natural gas or propane.

**SECTION D. Source Level Requirements**

Source ID: 105

Source Name: MISC VOC SOURCES

Source Capacity/Throughput:

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

The permittee shall limit VOC content and VOC emissions as follows:

**(a) Packaging Operations**

- (1) Adhesive - 10% VOC content by % weight and 4995 lbs/yr
- (2) Ink - 10 % VOC content by % weight and 5 lbs/yr

**(b) Press Cleanup - 2.5 tons per year (including parts washer emissions)**

- (1) Primary Hand Cleaning - 10% VOC content by % weight and 900 lbs/yr
- (2) Secondary Hand Cleaning - 100% VOC content by % weight and 425 lbs/yr

**(c) Die Making**

- (1) Adhesive - 100% VOC content by % weight and 55 lbs/yr
- (2) Adhesive Removers - 100% VOC content by % weight and 4860 lbs/yr
- (3) Film Cleaners - 100% VOC content by % weight and 285 lbs/yr

**(d) Plate Preparation**

- (1) Cyrel Rubber - 100% VOC content by % weight and 1079 lbs/yr
- (2) Adhesive Remover - 100% VOC content by % weight and 4121 lbs/yr

**(e) Maintenance Operations**

- (1) Miscellaneous Material - 100% VOC content by % weight and 350 lbs/yr

**(f) Raw Material Storage - 10% VOC content by % weight and 0.1 tons/yr****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.****# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the VOC content and VOC emissions from the following operations on a monthly and 12-month rolling basis:

1. Packaging Operations
2. Press Cleanup
3. Die Making
4. Plate Preparation
5. Maintenance Operations
6. Raw Material Storage

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

The permittee shall record the VOC content and VOC emissions from the following operations on a monthly and 12-month rolling basis:

1. Packaging Operations
2. Press Cleanup
3. Die Making
4. Plate Preparation
5. Maintenance Operations
6. Raw Material Storage

**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.**

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

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

This source consists of the following operations:

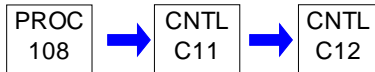
- (a) Packaging Operations
- (b) Press Cleanup
- (c) Die Making
- (d) Plate Preparation
- (e) Maintenance Operations
- (f) Raw Material Storage.

**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: BY-PRODUCT PAPERBOARD

Source Capacity/Throughput:

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

- a) Emissions from By-Product Paper must pass through Air Sharks (C11) and Filter House (C12)
- b) The Filter House (C12) exhaust may only be vented to back into the facility.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**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.**

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

**VII. ADDITIONAL REQUIREMENTS.**

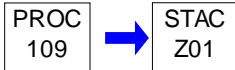
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: 109

Source Name: PARTS WASHERS

Source Capacity/Throughput:

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall limit VOC content and VOC emissions as follows:

Safety Kleen Parts Washer - 100% VOC content by % weight and 650 lbs/yr.

**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.**

# 002 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall monitor the quantity and identity of all VOC solvents used for cleanup purposes on a monthly basis.

**IV. RECORDKEEPING REQUIREMENTS.**

# 003 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

(a) The permittee shall maintain monthly records of the quantity and identity of all VOC solvents used for cleanup purposes.

(b) The permittee shall maintain monthly records of the VOC content and VOC emissions from each operation contained in this source, including 12-month rolling sums for emissions.

# 004 [25 Pa. Code §129.63]

**Degreasing operations**

The permittee shall perform the following recordkeeping for the Safety Kleen parts washer:

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

- (1) The name and address of the solvent supplier.
- (2) The type of solvent including the product or vendor identification number.
- (3) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

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

**V. REPORTING REQUIREMENTS.**

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



**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 005 [25 Pa. Code §129.63]****Degreasing operations**

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

- (a) The immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater, pursuant to 25 Pa. Code § 129.63(a)(1).
- (b) The immersion cold cleaning machines and remote reservoir cold cleaning machines shall have a permanent, conspicuous label summarizing the operating requirements contained in this permit for this source, pursuant to 25 Pa. Code § 129.63(a)(2)(i).
- (c) The immersion cold cleaning machines and remote reservoir cold cleaning machines shall be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover, pursuant to 25 Pa. Code § 129.63(a)(2)(ii).

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

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

- (a) The permittee shall ensure the following discretionary good operating practices, pursuant to 25 Pa. Code § 129.63(a)(2)(i)(A)-(C):
  - (1) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.
  - (2) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
  - (3) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.
- (b) The permittee shall operate the cold cleaning machines in accordance with the following procedures, pursuant to 25 Pa. Code § 129.63(a)(3):
  - (1) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
  - (2) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
  - (3) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
  - (4) Air agitated solvent baths may not be used.
  - (5) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

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

The permittee shall perform the following work practice standard for the Safety Kleen parts washer:

A person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs, pursuant to 25 Pa. Code § 129.63(a)(4).

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

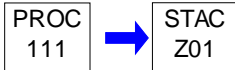
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: 111

Source Name: KBA 145 OFFSET

Source Capacity/Throughput:

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

The permittee shall operate the KBR Press (Source ID 111) under the following conditions:

(a) The permittee shall maintain the as-applied VOC content of the fountain solution on the press at or below 5.0%, by weight, and shall refrigerate the fountain solution to 60°F or less. The temperature-monitoring instrument of the refrigerated system shall be maintained to demonstrate compliance with the temperature requirements of this condition.

(b) The permittee shall meet one of the following requirements for the blanket and roller cleaning solution :

- (1) VOC content, as applied, is less than 70% by weight, or
- (2) VOC composite partial vapor pressure, as used, is less than or equal to 10 mm Hg at 20°C (68°F).

(c) The use of one or more cleaning solutions with a higher VOC content, composite partial vapor pressure or both, than list in part (b) is limited to 110 gal per year total of all solutions exceeding the limits in part (b).

[Compliance with this streamlined condition demonstrates compliance with 25 Pa. Code § 129.67b]

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

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the surface coating process (paper coating), unless the VOC content of each as applied coating is equal to or less than 4.84 pounds of VOC per gallon of coating solids, pursuant to 25 Pa. Code § 129.52b(a)(2).

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

[Additional authority for this condition is also derived from 25 Pa. Code §129.67b and 40 CFR part 60, Appendix A.]

(a) The permittee shall test their coating(s), as applied for the following, in accordance with Method 24, as specified in 40 CFR Part 60, Appendix A:

- (1) volatile matter content;
- (2) water content;
- (3) density;
- (4) volume solids; and
- (5) weight solids.

(b) The permittee shall test each ink, solvent, adhesive, and coating used for hazardous air pollutant (HAP) content by using a Department approved method.

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

**SECTION D. Source Level Requirements**

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

- (1) a statement from the supplier that EPA Method 24 was used;
- (2) a Certified Product Data Sheet (CPDS) is received from the supplier; or
- (3) a SDS (the upper bound) is used.

[Compliance with Part (b) or (d) of this condition satisfies the requirements of 25 Pa. Code § 129.52b(d)(1)]

**III. MONITORING REQUIREMENTS.**

**# 004 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall monitor the temperature of the fountain solution as used on the press.

**# 005 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

(a) The permittee shall monitor for each ink, blanket, and roller cleaning solution used:

- (1) The monthly consumption in pounds or gallons;
- (2) The percent by weight VOCs and HAPs content, as applied;
- (3) Calculated emissions of VOCs and HAPs on a monthly and 12-month rolling basis.

(b) Alternately, the permittee may use the ink with the highest VOC and HAP content to represent all inks used by all sheet fed offset lithographic printing presses for calculating emissions.

**# 006 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall monitor for each fountain solution and additive used:

- (a) The monthly consumption in pounds or gallons;
- (b) The percent of weight or weight to volume ratio (lbs/gal) VOC and Hazardous Air Pollutant (HAP) content;
- (c) Calculated emissions of VOC and HAP on a monthly and 12-month rolling basis.

**# 007 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

For VOC containing cleaning solutions used on all lithographic presses at the facility that do not meet the VOC composite partial vapor pressure or VOC content restrictions under Condition #001, the permittee shall monitor VOC and HAP emissions on a monthly basis and as a 12-month rolling sum.

**IV. RECORDKEEPING REQUIREMENTS.**

**# 008 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

(a) The permittee shall record for each ink, blanket, and roller cleaning solution used:

- (1) The monthly consumption in pounds or gallons;
- (2) The percent by weight VOCs and HAPs content, as applied;
- (3) Calculated emissions of VOCs and HAPs on a monthly and 12-month rolling basis.

(b) Alternately, the permittee may use the ink with the highest VOC and HAP content to represent all sheetfed offset lithographic printing presses for calculating emissions.

**# 009 [25 Pa. Code §127.441]**

**Operating permit terms and conditions.**

The permittee shall record for each fountain solution and additive used:

**SECTION D. Source Level Requirements**

- (a) The monthly consumption in pounds or gallons;
- (b) The percent of weight or weight to volume ratio (lbs/gal) VOC and Hazardous Air Pollutant (HAP) content;
- (c) Calculated emissions of VOC and HAP on a monthly and 12-month rolling basis.
- (d) The as used temperature of the fountain solution once per shift.

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

For VOC containing cleaning solutions used on all lithographic presses at the facility that do not meet the VOC composite partial vapor pressure or VOC content restrictions under Condition #001, the permittee shall calculate and record VOC and HAP emissions on a monthly basis and as a 12-month rolling sum.

**V. REPORTING REQUIREMENTS.**

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

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

The following work practice standards shall be followed:

- (a) all VOC-containing materials shall be stored in closed, nonabsorbent, non-leaking containers when not being mixed or transferred to another container;
- (b) cloth and paper, or other absorbent applicators, moistened with coatings, solvents or cleaning solvents, shall be stored in closed, nonabsorbent, non-leaking containers; and
- (c) all spills shall be cleaned up as soon as possible.

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

Source ID 111 consists of one(1) Koenig and Bauer Rapida 145 Offset Heatset lithographic 6-color printing press with coating station and electric heating via infrared/hot dryers.

**SECTION E. Source Group Restrictions.**

Group Name: FLEXOGRAPHIC

Group Description: Presses

Sources included in this group

ID	Name
102	FLEXOGRAPHIC PRESS 314
104	FLEXOGRAPHIC PRESS 312

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

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

**# 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, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis, pursuant to 25 Pa. Code § 123.21.

**# 003 [25 Pa. Code §129.52b]****Control of VOC emissions from paper, film and foil surface coating processes.**

(a) The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from the surface coating process (paper coating), unless the VOC content of each as applied coating is equal to or less than 4.84 pounds of VOC per gallon of coating solids, pursuant to 25 Pa. Code § 129.52b(a)(2).

(b) If the source was subject to RACT requirements prior to January 1, 2012, this requirement supersedes the RACT requirements unless the RACT requirements are more stringent than those in 25 Pa. Code § 129.52b. The more stringent of the requirements shall apply.

**# 004 [25 Pa. Code §129.67]****Graphic arts systems**

A person may not permit the emission into the outdoor atmosphere of VOCs from this flexographic printing press unless the volatile fraction of the ink, as applied to the substrate, contains 25% or less by volume of VOC and 75% or more by volume of water, pursuant to 25 Pa. Code § 129.67(b)(1).

**Fuel Restriction(s).****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall burn natural gas or propane in the dryer associated with this source.

**Throughput Restriction(s).****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall only used water-based ink on the presses in this group. Water-based ink is defined as inks containing less than 25% VOCs and more than 75% water in the volatile fraction, and more than 5% water by weight.

**II. TESTING REQUIREMENTS.**

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

**SECTION E. Source Group Restrictions.****III. MONITORING REQUIREMENTS.****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the amount and type of fuel consumed by the dryer associated with this source on a monthly and 12-month rolling basis.

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

The permittee shall maintain monthly and 12-month rolling records of the amount and type of fuel consumed by the dryer associated with this source.

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

The permittee shall keep on hand chemical composition data, including lbs of VOC per gallon coating solid and %VOC by volume, for all inks and coatings applied to this press.

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

a) The permittee shall maintain job sheets, or other tracking method, for the recording of the type, amount and VOC content of materials used on the presses on a daily basis. The information on job sheet, or other tracking sheet, shall be sufficient as to allow the calculation of daily emissions.

b) The permittee shall calculate the emissions from each press on a weekly basis and compile the emissions on a monthly and 12-month rolling basis.

**# 011 [25 Pa. Code §129.52b]****Control of VOC emissions from paper, film and foil surface coating processes.**

The owner or operator of a facility subject to this section shall maintain records sufficient to demonstrate compliance with Section 129.52b(d) as follows:

(a) The following parameters for each coating, thinner, ink, and other component as supplied:

- (1) The coating, thinner, ink, or component name and identification number.
- (2) The volume used.
- (3) The mix ratio.
- (4) The density or specific gravity.
- (5) The weight percent of total volatiles, water, solids, and exempt solvents.
- (6) The volume percent of solids.

(b) The VOC content of each coating, thinner, ink, and other component as supplied and applied.

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

The permittee shall maintain and operate this source in accordance with manufacturer's specifications and good engineering practices.

**# 013 [25 Pa. Code §129.52b]****Control of VOC emissions from paper, film and foil surface coating processes.**

The following work practice standards shall be followed:

**SECTION E. Source Group Restrictions.**

- (a) all VOC-containing materials shall be stored in closed, nonabsorbent, non-leaking containers when not being mixed or transferred to another container;
- (b) cloth and paper, or other absorbent applicators, moistened with coatings, solvents or cleaning solvents, shall be stored in closed, nonabsorbent, non-leaking containers; and
- (c) all spills shall be cleaned up as soon as possible.

**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
102	FLEXOGRAPHIC PRESS 314
<b>Emission Limit</b>	
0.040 gr/DRY FT3	PM10
500.000 PPMV	SOX
104	FLEXOGRAPHIC PRESS 312
<b>Emission Limit</b>	
0.040 gr/DRY FT3	PM10
500.000 PPMV	SOX
10.000 Tons/Yr	VOC
111	KBA 145 OFFSET
<b>Emission Limit</b>	
2.700 Tons/Yr	VOC

**Site Emission Restriction Summary**

Emission Limit	Pollutant
20.000 Tons/Yr	VOC

**SECTION H. Miscellaneous.**

(a) Certain terms and conditions contained in this permit have been derived from the following previously issued permits and plan approvals:

RACT OP-09-0008 Miscellaneous VOC Sources  
09-320-007 Flexographic Printing Press #312  
09-318-003A Flexographic Printing Press #314  
PA-09-0008 Flexographic Printing Press #309.

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

- (1) 6,000 gallon wastewater storage tank.
- (2) Paper Cyclone #1 - internal collection system and does not exhaust outdoors - associated with Source 108 By-Product Paperboard.

(c) August/September 2009. APS: 345487, AUTH: 785932. The Department renewed the facility-wide Operating Permit.

(d) The Department renewed the facility-wide Operating Permit No. 09-00008 ( APS : 345487, AUTH: 1007142 ), also incorporated GP7 for Source ID 110 ( APS: 833970, AUTH: 1011372 ), and Minor Modification (APS # 345487, AUTH # 1088987)

(e) Auth ID 1309198, APS 345487 : renewal of state only natural minor permit 09-00008. Incorporated new KBR lithographic press, Source 111, from RFD 8909 in to permit. Removal of all cyclones (C01, C02, C03) from permit and replace with C11 (Air Sharks) and C12(Filter House) as controls for Source 108 - By-product Paperboard. Emissions from Source 108 now exhaust to inside facility. Language added for this change to in order to meet requirements under 25 Pa. Code § 127.14(a)(8). Source 106, Make Up Air Heaters moved to Section H as insignificant sources used to heat building by direct transfer for human comfort. Emissions will still need to be included in site wide total.



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

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