



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

**STATE ONLY SYNTHETIC MINOR OPERATING PERMIT**

Issue Date:	July 15, 2020	Effective Date:	April 5, 2024
Revision Date:	April 5, 2024	Expiration Date:	June 30, 2025
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: 43-00273**

Synthetic Minor

Federal Tax Id - Plant Code: 81-4241865-1

**Owner Information**

Name: METAL LITHO & LAMINATING LLC  
Mailing Address: 242 REYNOLDS INDUSTRIAL PARK DR  
GREENVILLE, PA 16125-8216

**Plant Information**

Plant: DBA SELECT METAL LITHO/GREENVILLE  
Location: 43 Mercer County 43932 Pymatuning Township  
SIC Code: 3479 Manufacturing - Metal Coating And Allied Services

**Responsible Official**

Name: MICHAEL MAIELLA  
Title: GENERAL MGR  
Phone: (724) 646 - 1222 Email: mmaiella@rsi.biz

**Permit Contact Person**

Name: THOMAS J. ANDAMASARIS  
Title: PLANT MGR  
Phone: (724) 646 - 1222 Email: tandamasaris@rsi.biz

[Signature] \_\_\_\_\_  
ERIC A. GUSTAFSON, NORTHWEST REGION AIR PROGRAM MANAGER



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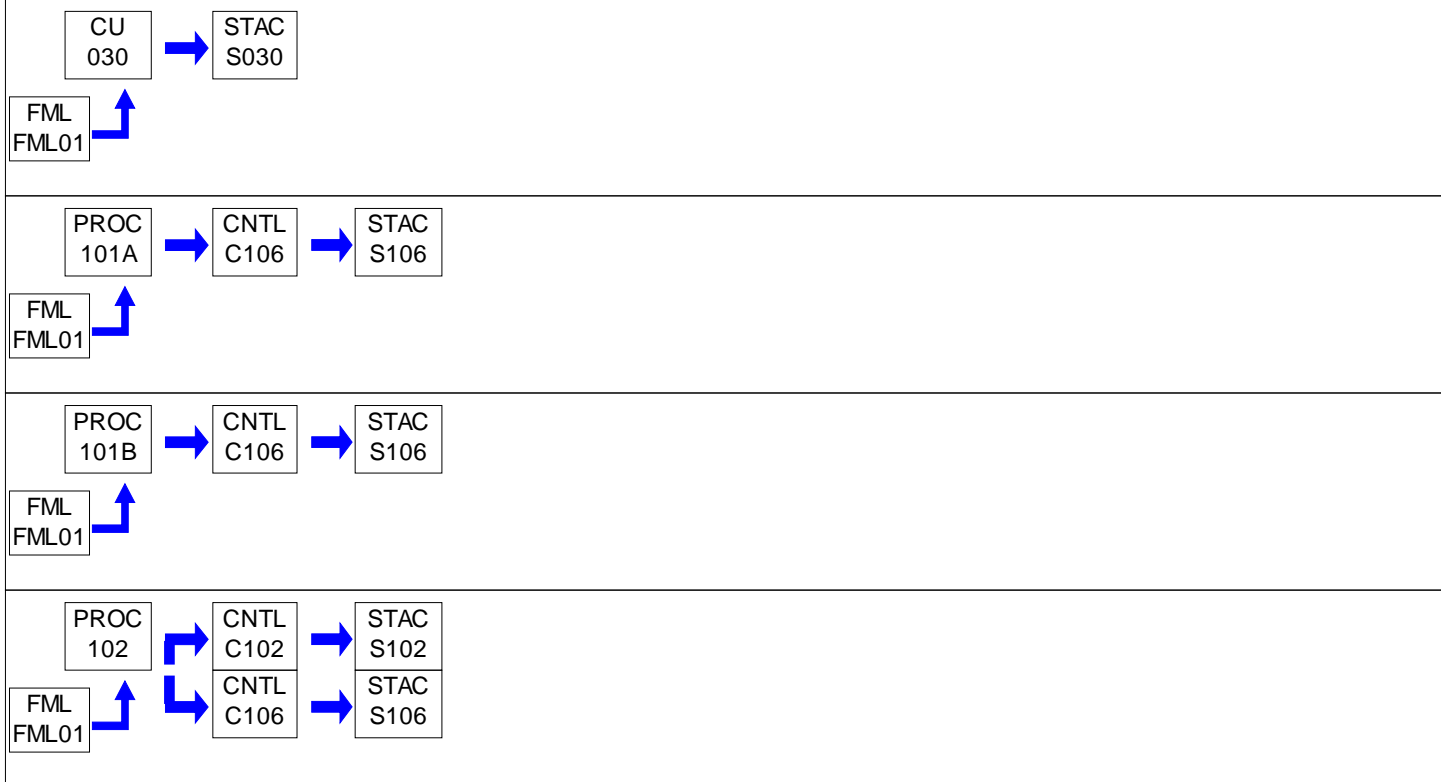
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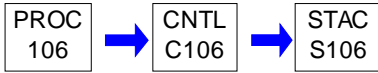
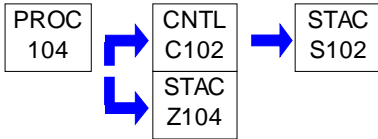
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
030	MISC. SPACE AND WATER HEATERS	5.400 MMBTU/HR	
		5.400 MCF/HR	Natural Gas
101A	2 COLOR LITHOGRAPH PRINT - UNIT 1, W/ DRYING OVEN	5.300 MMBTU/HR	
		120.000 Lbs/HR	INK
		5.300 MCF/HR	Natural Gas
101B	2 COLOR LITHOGRAPH PRINT - UNIT 2, W/ DRYING OVEN	6.000 MMBTU/HR	
		N/A	
		6.000 MCF/HR	Natural Gas
102	COATING LINE "A" & DRYING OVEN	4.360 MMBTU/HR	
		120.000 Lbs/HR	PAINT
		4.360 MCF/HR	Natural Gas
104	MISC. SOLVENT USAGE	N/A	SOLVENT
106	NEW COATING LINE 'B'	120.000 Lbs/HR	COATINGS
C102	CATALYTIC INCINERATOR - SOURCES 102 & 104		
C106	REGENERATIVE THERMAL OXIDIZER		
FML01	NATURAL GAS PIPELINE		
S030	STACKS - SOURCE ID: 030		
S102	STACK - CONTROL DEVICE C102		
S106	RTO STACK		
Z104	FUGITIVE SOLVENT EMISSIONS		

**PERMIT MAPS**



**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 act.

**# 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) - (8) [Do not apply]

(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.

(b) An application form for requesting a determination under either subsection (a)(9) or § 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant is required to demonstrate that the requirements of subsections (a)(9) and (c) and § 123.2 [Condition #003, below] (relating to fugitive particulate matter) or of the requirements of § 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) [Printed under Work Practice Requirements in this section of permit.]

(d) [Does not apply]

**# 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 § 123.1(a)(1)—(9) [Condition #002, above] (relating to prohibition of certain fugitive emissions) if the emissions are visible at the point the emissions pass outside the person's property.

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

(a) [Printed under Work Practice Requirements in this section of permit.]

**SECTION C. Site Level Requirements**

(b) 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.

(c) [Does not apply]

**# 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:

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

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

The limitations of § 123.41 [Condition #005, above] (relating to limitations) shall not apply to a visible emission in any of the following instances:

- (1) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) When the emission results from sources specified in § 123.1 (a)(1)—(9) [Condition #002, above] (relating to prohibition of certain fugitive emissions).
- (4) [Does not apply]

**# 007 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Facility-wide emissions of VOC shall not exceed 49.5 tons per year, calculated as a 12-month rolling total.

[Plan Approval 43-273A, Section C, Condition #008]

**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.****# 008 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of devices approved by the Department.

**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).

**SECTION C. Site Level 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.****# 009 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

[From 25 Pa. Code § 123.1(c):]

(c) A person responsible for any source specified in subsections (a)(1)—(7) or (9) [Condition #002, above] shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions include, but not be limited to, the following:

- (1) 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.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (3) Paving and maintenance of roadways.
- (4) 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.

**# 010 [25 Pa. Code §123.31]****Limitations**

[From 25 Pa. Code § 123.31(a):]

(a) Limitations are as follows:

- (1) If control of malodorous air contaminants is required under subsection (b) [Condition #004, above], emissions shall be incinerated at a minimum of 1200°F for at least 0.3 second prior to their emission into the outdoor atmosphere.
- (2) Techniques other than incineration may be used to control malodorous air contaminants if such techniques are equivalent to or better than the required incineration in terms of control of the odor emissions and are approved in writing by the Department.

**# 011 [25 Pa. Code §129.14]****Open burning operations**

(a) [Does not apply]

(b) Outside of air basins. No person may permit the open burning of material in an area outside of air basins in a manner that:

- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
- (3) The emissions interfere with the reasonable enjoyment of life or property.
- (4) The emissions cause damage to vegetation or property.
- (5) The emissions are or may be deleterious to human or animal health.





## SECTION C. Site Level Requirements

(c) Exceptions. The requirements of subsections (a) and (b) do not apply where the open burning operations result from:

- (1) 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.
- (2) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) - (5) [Do not apply]
- (6) A fire set solely for recreational or ceremonial purposes.
- (7) A fire set solely for cooking food.

(d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:

- (1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor—A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes—Trees, shrubs and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

- (2) [Does not apply]

(3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:

(i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b).

(ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes transported from an air basin for disposal outside of an air basin.

(4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in that chapter.

[This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management 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.

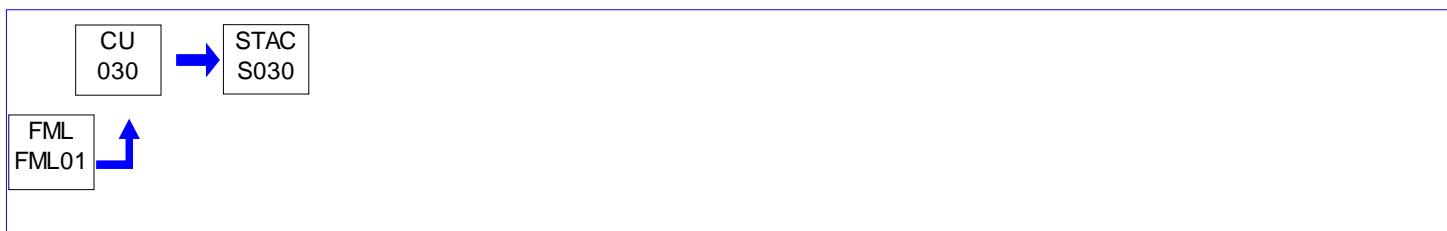
**SECTION D. Source Level Requirements**

Source ID: 030

Source Name: MISC. SPACE AND WATER HEATERS

Source Capacity/Throughput: 5.400 MMBTU/HR

5.400 MCF/HR Natural Gas

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

# 001 [25 Pa. Code §123.11]

**Combustion units**

A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the rate of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of Btus per hour is greater than 2.5 but less than 50.

[applies to air make-up unit]

# 002 [25 Pa. Code §123.22]

**Combustion units**

No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO<sub>2</sub>, from this combustion unit in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

**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).

**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: 101A

Source Name: 2 COLOR LITHOGRAPH PRINT - UNIT 1, W/ DRYING OVEN

Source Capacity/Throughput: 5.300 MMBTU/HR

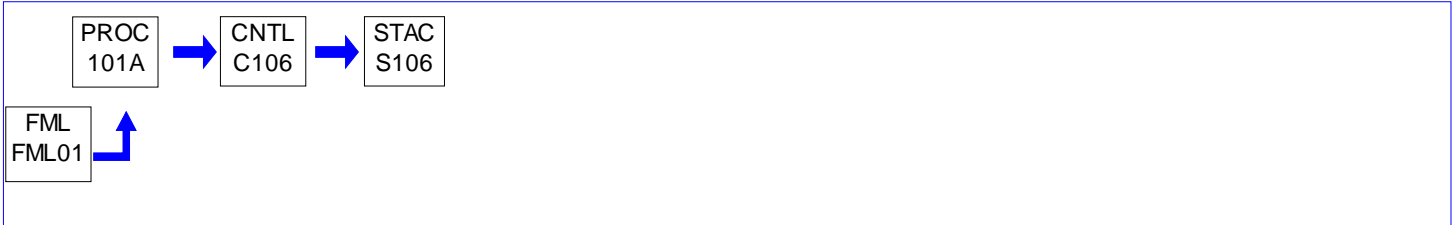
120.000 Lbs/HR INK

5.300 MCF/HR Natural Gas

Conditions for this source occur in the following groups: 1

129.52

RTO REQUIREMENTS

**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.****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Plan Approval 43-273A]

For periods when this source is operated without the RTO (C106), the permittee shall maintain records of the date(s) and time(s) and cause(s) of the malfunction or maintenance activity, and any corrective action(s) taken.

**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 §127.12b]****Plan approval terms and conditions.**

[Plan Approval 43-273A]

**SECTION D. Source Level Requirements**

During periods of downtime for control device C106, the source shall operate in accordance with the applicable provisions of 25 Pa. Code §129.52.



**SECTION D. Source Level Requirements**

During periods of downtime for control device C106, the source shall operate in accordance with the applicable provisions of 25 Pa. Code §129.52.

**SECTION D. Source Level Requirements**

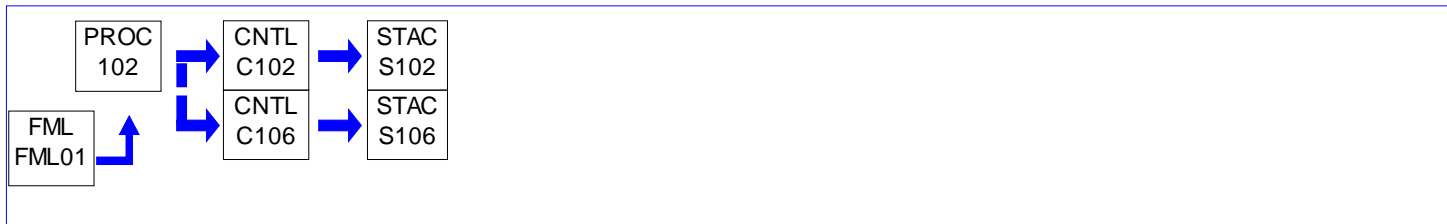
Source ID: 102

Source Name: COATING LINE "A" &amp; DRYING OVEN

Source Capacity/Throughput: 4.360 MMBTU/HR  
 120.000 Lbs/HR PAINT  
 4.360 MCF/HR Natural Gas

Conditions for this source occur in the following groups: 1

129.52  
 PA-43-318-00019  
 RTO REQUIREMENTS  
 STACK TESTING REQUIREMENTS



This source occurs in alternate operation C102 BACKUP

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

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

This source shall use only natural gas as a fuel.

**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).



**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) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Requirements**

Source ID: 104

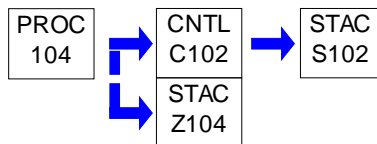
Source Name: MISC. SOLVENT USAGE

Source Capacity/Throughput:

N/A

SOLVENT

Conditions for this source occur in the following groups: STACK TESTING REQUIREMENTS

**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.**

# 001 [25 Pa. Code §127.441]

**Operating permit terms and conditions.**

The permittee shall maintain records of the quantities and types of solvents used by this source. These records are to be retained for five years and are to be made available to the Department upon request.

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements) 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: 106

Source Name: NEW COATING LINE 'B'

Source Capacity/Throughput:

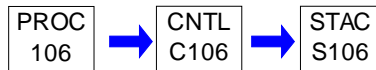
120.000 Lbs/HR

COATINGS

Conditions for this source occur in the following groups: 1

129.52

RTO REQUIREMENTS

**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.**

# 001 [25 Pa. Code §127.12b]

**Plan approval terms and conditions.**

[Plan Approval 43-273A]

Control device C106 shall be operated at all times that this source is in operation.

**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 E. Source Group Restrictions.**

Group Name: 1

Group Description: Paint booth/lines and process heaters PM &amp; SOx limits of Chapter 123

Sources included in this group

ID	Name
101A	2 COLOR LITHOGRAPH PRINT - UNIT 1, W/ DRYING OVEN
101B	2 COLOR LITHOGRAPH PRINT - UNIT 2, W/ DRYING OVEN
102	COATING LINE "A" & DRYING OVEN
106	NEW COATING LINE 'B'

**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 process in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

# 002 [25 Pa. Code §123.21]

**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a 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.

**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 E. Source Group Restrictions.**

Group Name: 129.52

Group Description: Surface Coating requirements of 25 Pa Code Section 129.52

**Sources included in this group**

ID	Name
101A	2 COLOR LITHOGRAPH PRINT - UNIT 1, W/ DRYING OVEN
101B	2 COLOR LITHOGRAPH PRINT - UNIT 2, W/ DRYING OVEN
102	COATING LINE "A" & DRYING OVEN
106	NEW COATING LINE 'B'

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §129.52]****Surface coating processes**

(a) This section applies to a surface coating process category, regardless of the size of the facility, which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year since January 1, 1987.

(b) A person may not cause or permit the emission into the outdoor atmosphere of VOCs from a surface coating process category listed in Table I, unless one of the following limitations is met:

(1) The VOC content of each as applied coating is equal to or less than 4.62 pounds of VOC per gallon of coating solids.

(i) The VOC content of the as applied coating, expressed in units of weight of VOC per volume of coating solids, shall be calculated as follows:

$$\text{VOC} = (\text{Wo})(\text{Dc})/\text{Vn}$$

Where:

VOC = VOC content in lb VOC/gal of coating solids

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

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

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

Dc = Density of coating, lb/gal, at 25°C

Vn = Volume percent of solids of the as applied coating

(ii) - (iii) [Do not apply]

(iv) Sampling and testing shall be done in accordance with the procedures and test methods specified in Chapter 139 (relating to sampling and testing).

(2) The overall weight of VOCs emitted to the atmosphere is reduced through the use of vapor recovery or incineration or another method which is acceptable under § 129.51(a) (relating to general). The overall efficiency of a control system, as determined by the test methods and procedures specified in Chapter 139 shall be no less than the equivalent overall efficiency calculated by the following equation:

$$\text{O} = (1 - \text{E}/\text{V}) \times 100$$

Where:

V = The VOC content of the as applied coating, in lb VOC/gal of coating solids or lb VOC/lb of coating solids.

E = Table I limit in lb VOC/gal of coating solids or lb VOC/lb of coating solids.

O = Overall control efficiency.

**SECTION E. Source Group Restrictions.**

(c) [Refer to Recordkeeping Requirements in this section of permit.]

(d) The solvents methyl chloroform (1,1,1-trichloroethane) and methylene chloride are exempt from control under this section and § 129.67 (relating to graphic arts systems). A surface coating process which seeks to comply with this section through the use of an exempt solvent may not be included in any alternative standards.

(e) - (f) [Do not apply.]

(g) [Refer to Recordkeeping Requirements in this section of permit.]

(h) The VOC standards in Table I do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

(1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.

(2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

(i) - (k) [Do not apply]

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.****# 002 [25 Pa. Code §129.52]****Surface coating processes**

(a) - (b) [Refer to Restrictions in this section of permit.]

(c) A facility, regardless of the facility's annual emission rate, which contains surface coating processes shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of:

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

(i) The coating, thinner or component name and identification number.

(ii) The volume used.

(iii) The mix ratio.

(iv) The density or specific gravity.

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

(vi) The volume percent of solids for Table I surface coating process categories 1--10.

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

(3) The VOC content of each as applied coating.

**SECTION E. Source Group Restrictions.**

(d) - (f) [Refer to Restrictions in this section of permit.]

(g) The records shall be maintained for 5 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

(h) - (k) [Refer to Restrictions in this section of permit.]

**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 E. Source Group Restrictions.**

Group Name: PA-43-318-00019

Group Description: Requirements of Plan Approval 43-318-00019 for Source 102 / Control 102.

**Sources included in this group**

ID	Name
102	COATING LINE "A" & DRYING OVEN

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Catalyst inlet and outlet temperatures shall be recorded whenever the unit is in operation, and the recording charts so obtained shall be made available to Department personnel upon request for a period of at least five (5) years.

[From Plan Approval Number 43-318-00019, Condition 10.]

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

a) A magnehelic gauge of suitable range shall be permanently installed to indicate the pressure drop across the catalytic incinerator.

b) The catalytic incinerator manufacturer's recommendations for scheduled maintenance are hereby incorporated by reference and the company shall perform all such scheduled maintenance at regular intervals and keep a record thereof for a period of five (5) years. Upon request, such records shall be made available to Department personnel.

c) Temperature sensing and recording devices shall be installed to show that the temperature rise across the catalyst bed is as stated on the Plan Approval application. Catalyst inlet and outlet temperatures shall be recorded whenever the unit is in operation, and the recording charts so obtained shall be made available to Department personnel upon request for a period of at least five (5) years.

[From Plan Approval Number 43-318-00019, Conditions 7, 8, and 10.]

**VII. ADDITIONAL REQUIREMENTS.**

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



**SECTION E. Source Group Restrictions.**

Group Name: RTO REQUIREMENTS

Group Description: Requirements for Regenerative Thermal Oxidizer (C106)

Sources included in this group

ID	Name
101A	2 COLOR LITHOGRAPH PRINT - UNIT 1, W/ DRYING OVEN
101B	2 COLOR LITHOGRAPH PRINT - UNIT 2, W/ DRYING OVEN
102	COATING LINE "A" & DRYING OVEN
106	NEW COATING LINE 'B'

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Plan Approval 43-273A]

VOC emissions from the stack exiting the RTO shall not exceed either of:

- a. 3.55 lb/hr; or
- b. 15.56 tons per year, calculated as a 12-month rolling total

**II. TESTING REQUIREMENTS.****# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Plan Approval 43-273A]

- (a) Within 180 days of commencement of operation of the RTO, the permittee shall conduct a stack test for VOC in order to demonstrate compliance with the emission limits set forth in this plan approval. An extension may be granted by the Department provided that the permittee submits a written request at least 60 days prior to the end of the 180 days. [Initial test completed May 28, 2021.]
- (b) Repeat stack testing of this source for VOC shall be conducted a minimum of once within each subsequent five (5) year period following the initial stack test.
- (c) The stack tests shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department to demonstrate compliance with the emission limits for this source. Appropriate U.S. EPA Reference Methods shall be used to determine the emission rates of all pollutants. Testing shall occur when the subject source(s) are operating at maximum normal operating conditions.
- (d) Pursuant to 25 Pa. Code § 139.3 to at least 90 calendar days prior to commencing an emissions testing program, a test protocol shall be submitted to the Department for review and approval. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (e) Pursuant to 25 Pa. Code § 139.3 at least 15 calendar days prior to commencing an emission testing program, notification as to the date and time of testing shall be given to the appropriate Regional Office. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.
- (f) Pursuant to 25 Pa. Code Section 139.53(a)(3) within 15 calendar days after completion of the on-site testing portion of an emission test program, if a complete test report has not yet been submitted, an electronic mail notification shall be sent to the Department's Division of Source Testing and Monitoring indicating the completion date of the on-site testing.
- (g) Pursuant to 40 CFR Part 60.8(a), 40 CFR Part 61.13(f) and 40 CFR Part 63.7(g) a complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program. For those tests being conducted pursuant to 40 CFR Part 61, the, a complete test report shall be submitted within 31 days after completion of the test.

**SECTION E. Source Group Restrictions.**

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

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

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

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

(k) Pursuant to 25 Pa. Code Section 139.53(a)(1) and 139.53(a)(3) all submittals, besides notifications, shall be accomplished through PSIMS\*Online available through <https://www.depgreenport.state.pa.us/ecommm/Login.jsp> when it becomes available. If internet submittal can not be accomplished, one electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager. Electronic copies of the protocol and stack test report shall be sent to the following e-mail addresses:

CENTRAL OFFICE:

RA-EPstacktesting@pa.gov

NORTHWEST REGIONAL OFFICE:

RA-EPNWstacktesting@pa.gov

Notifications and Supplemental Information shall be submitted to the following:

OnBase Submittal

<http://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx>

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

(m) If the results of a stack test, performed as required by this approval, exceed the level specified in any condition of this plan approval, the Permittee shall take appropriate corrective actions. Within 30 days of the Permittee receiving the stack test results, a written description of the corrective actions shall be submitted to the Department. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within 30 days, if the corrective actions taken are deficient. Within 30 days of receipt of the notice of deficiency, the Permittee shall submit a description of additional corrective actions to the Department. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(n) If the results of the required stack test exceed any limit defined in this plan approval, the test was not performed in accordance with the stack test protocol or the source and/or air cleaning device was not operated in accordance with the plan approval, then another stack test shall be performed to determine compliance. Within 120 days of the Permittee receiving the original stack test results, a retest shall be performed. The Department may extend the retesting deadline if the Permittee demonstrates, to the Department's satisfaction, that retesting within 120 days is not practicable. Failure of the second test to demonstrate compliance with the limits in the plan approval, not performing the test in accordance with the stack test protocol or not operating the source and/or air cleaning device in accordance with the plan approval may be grounds for immediate revocation of the plan approval to operate the affected source.

**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).

**IV. RECORDKEEPING REQUIREMENTS.****# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Plan Approval 43-273A]

The permittee shall maintain a record of all preventative maintenance inspections of the source(s) and control device. These records shall, at a minimum, contain the dates of the inspections, any problems or defects, the actions taken to correct the problems or defects, and any routine maintenance performed.

**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Plan Approval 43-273A]

(a) The permittee shall record the following operational data from the control device. Records may be maintained via strip chart recorders, data acquisition systems, or alternate means as approved by the Department:

1. RTO combustion chamber temperature - continuously (defined as at least once every 15 minutes)

(b) [Not Applicable]

(c) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, probable causes and corrective actions taken for the incidents.

(d) The permittee shall record all inspections, repairs, and maintenance performed on the monitoring equipment.

(e) All records shall be maintained on site for a minimum of five (5) years and shall be made available to the Department upon request.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Plan Approval 43-273A]

(a) The RTO combustion chamber temperature shall be maintained at a minimum of 1550°F

[The above ranges may be modified, with prior Departmental approval, through additional compliant performance testing at alternate parameter values.]

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

1. The permittee shall install detectors or sensors at a Department approved location for obtaining data that is representative of the monitored indicator. The permittee shall check the position of the sensor(s) and recalibrate semiannually, or whenever the range of a sensor is exceeded, or a new sensor is installed.

2. The permittee shall develop verification procedures to confirm that the operational status of the monitoring devices is within the expected range. (Operational status pertains to the accuracy of the measured values. The permittee may

**SECTION E. Source Group Restrictions.**

compare the data with any Department approved standardized data at a specific time interval.)

3. For QA/QC purposes, the permittee shall calibrate and check the accuracy of the monitoring equipment, according to the manufacturer's recommended procedures.

(c) The permittee shall maintain all monitoring equipment and stock spare parts as necessary for routine onsite repairs.

(d) The permittee shall ensure that at least 90% of the approved monitoring data has been properly and accurately collected.

(e) [Not Applicable]

(f) The permittee shall perform monthly external inspections of the control system.

(g) - (j) [Not Applicable]

**# 006 [25 Pa. Code §127.12b]**

**Plan approval terms and conditions.**

[Plan Approval 43-273A]

(a) The permittee shall install, maintain, and operate the source(s) and control device in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

(b) Except for periods of malfunction and preventative maintenance, the RTO shall be operated at all times the subject source(s) are in operation.

(c) The permittee shall install, maintain, and operate instrumentation sufficient to measure the RTO exhaust temperature. All gauges employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (+/- 2%) of full scale reading. Indicator(s) shall be mounted in accessible areas, and shall be maintained in good operating conditions at all times.

**VII. ADDITIONAL REQUIREMENTS.**

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

**SECTION E. Source Group Restrictions.**

Group Name: STACK TESTING REQUIREMENTS

Group Description: Stack Testing from Catalytic Incinerator

Sources included in this group

ID	Name
102	COATING LINE "A" & DRYING OVEN
104	MISC. SOLVENT USAGE

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.****# 001 [25 Pa. Code §127.511]****Monitoring and related recordkeeping and reporting requirements.**

(a) Within 12 months of the permit renewal issuance date the permittee shall conduct emission testing in accordance with Chapter 139 of the Rules and Regulations of the Department, to confirm the VOC destruction efficiency of the Catalytic Incinerator (C102) associated with this source.

(b) [25 Pa. Code § 139.53(a)(3)]

At least 90 calendar days prior to commencing an emissions testing program, a test protocol shall be submitted to the Department's Division of Source Testing and Monitoring and the appropriate Regional Office for review and approval. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

(c) [25 Pa. Code § 139.53(a)(3)]

At least 15 calendar days prior to commencing an emission testing program, notification as to the date and time of testing shall be given to the appropriate Regional Office. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.

(d) [25 Pa. Code § 139.53(a)(3)]

Within 15 calendar days after completion of the on-site testing portion of an emission test program, if a complete test report has not yet been submitted, an electronic mail notification shall be sent to the Department's Division of Source Testing and Monitoring at RA-epstacktesting@state.pa.us and the appropriate Regional Office indicating the completion date of the on-site testing.

(e) [25 Pa. Code Section 139.53(b)]

A complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program. For those tests being conducted pursuant to 40 CFR Part 61, a complete test report shall be submitted within 31 days after completion of the test.

(f) [25 Pa. Code Section 139.53(b)]

A complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:

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

(g) [25 Pa. Code § 139.3]

**SECTION E. Source Group Restrictions.**

All submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

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

(i) [25 Pa. Code Sections 139.53(a)(1) and 139.53(a)(3)]

All submittals, besides notifications, shall be accomplished through PSIMS\*Online available through <https://www.dep.greenport.state.pa.us/ecom/Login.jsp> when it becomes available. If internet submittal can not be accomplished, one electronic copy of all source test submissions (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to Regional Office AQ Program Manager. Electronic copies of the protocol and stack test report shall be sent to the following e-mail addresses:

**CENTRAL OFFICE:**

RA-EPstacktesting@pa.gov

**NORTHWEST REGIONAL OFFICE:**

RA-EPNWstacktesting@pa.gov

Notifications and Supplemental Information shall be submitted to the following:

OnBase Submittal

<http://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx>

(j) If the results of a stack test, performed as required by this operating permit, exceed the level specified in any condition of this operating permit, the Permittee shall take appropriate corrective actions. Within 30 days of the Permittee receiving the stack test results, a written description of the corrective actions shall be submitted to the Department. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within 30 days, if the corrective actions taken are deficient. Within 30 days of receipt of the notice of deficiency, the Permittee shall submit a description of additional corrective actions to the Department. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(k) If the results of the required stack test exceed any limit defined in this operating permit, the test was not performed in accordance with the stack test protocol or the source and/or air cleaning device was not operated in accordance with the operating permit, then another stack test shall be performed to determine compliance. Within 120 days of the Permittee receiving the original stack test results, a retest shall be performed. The Department may extend the retesting deadline if the Permittee demonstrates, to the Department's satisfaction, that retesting within 120 days is not practicable. Failure of the second test to demonstrate compliance with the limits in the operating permit, not performing the test in accordance with the stack test protocol or not operating the source and/or air cleaning device in accordance with the operating permit may be grounds for immediate revocation of the approval to operate the affected source.

**# 002 [25 Pa. Code §127.511]**

**Monitoring and related recordkeeping and reporting requirements.**

For the catalytic incinerator (C102), at least once for every 6000 hours of the catalytic incinerator operating time, or annually if the control device is operated greater than 6000 hours per year, the permittee shall perform a catalyst activity test of a sample of the catalyst contained in the control device. Testing shall be performed using the manufacturer's recommended test method. If the catalyst activity test reveals that an inlet temperature higher or lower than 650 degrees Fahrenheit is necessary to maintain a destruction efficiency of 90%, the permittee shall reset the oxidizer operating temperature accordingly.

**III. MONITORING REQUIREMENTS.**

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

**SECTION E. Source Group Restrictions.****IV. RECORDKEEPING REQUIREMENTS.****# 003 [25 Pa. Code §127.511]****Monitoring and related recordkeeping and reporting requirements.**

- a) The permittee shall maintain a record of the hours of operation of the Catalytic Incinerator (C102).
- b) The permittee shall maintain records of the required catalyst activity tests performed on the catalyst contained in the Catalytic Incinerator (C102).

**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 F. Alternative Operation Requirements.**

Alternative Operation Name: C102 BACKUP

**#001 CHANGES FROM NORMAL OPERATION**

Conditions for the use of catalytic oxidizer C102 as a backup control device during periods of downtime for C106

Sources included in this Alternative Operation:

ID	Name	Source Type
102	COATING LINE "A" & DRYING OVEN	Process

**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.**

**# 001 [25 Pa. Code §127.12b]  
Plan approval terms and conditions.**

- a. The permittee shall maintain records of the maintenance plan, and all maintenance performed on control device C102.
- b. All required records shall be maintained on site for a minimum of five (5) years, and shall be made available to the Department upon request.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

**# 002 [25 Pa. Code §127.12b]  
Plan approval terms and conditions.**

- a. The permittee is authorized to operate control device C102 to control emissions from Source 102 during periods of malfunction for control device C106.
- b. Control device C102 or control device C106 shall be operated at all times that the source is in operation.
- c. The facility shall follow the maintenance plan submitted to the Department which includes records of inspection dates and by whom they were conducted. Maintenance shall be conducted in accordance with the manufacturers specifications. The facility shall keep a record of the inspection including the following items:
  - i) The thermocouples for the catalyst bed shall be inspected.
  - ii) The gas valves (motors) crank arms shall be inspected.
  - iii) The motor fan shall be cleaned and greased.
  - iv) The safety limits shall be inspected.
  - v) The catalyst shall be checked and cleaned at least once every 6,000 hours.
  - vi) The catalyst activity shall be verified at least once every 6,000 hours.
  - vii) Records of any other maintenance related activity shall be noted.



**SECTION F. Alternative Operation Requirements.****VII. ADDITIONAL REQUIREMENTS.****# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Control device C102 shall continue to comply with all applicable provisions of this State Only Operating Permit (43-00273).

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
030	MISC. SPACE AND WATER HEATERS		
<b>Emission Limit</b>		<b>Pollutant</b>	
4.000	Lbs/MMBTU	Over any 1-hour period.	SOX
0.400	Lbs/MMBTU	applies to air make-up unit	TSP
101A	2 COLOR LITHOGRAPH PRINT - UNIT 1, W/ DRYING OVEN		
<b>Emission Limit</b>		<b>Pollutant</b>	
500.000	PPMV	Dry basis.	SOX
0.040	gr/DRY FT3		TSP
3.550	Lbs/Hr		VOC
15.560	Tons/Yr	12-month rolling total	VOC
101B	2 COLOR LITHOGRAPH PRINT - UNIT 2, W/ DRYING OVEN		
<b>Emission Limit</b>		<b>Pollutant</b>	
500.000	PPMV	Dry basis.	SOX
0.040	gr/DRY FT3		TSP
3.550	Lbs/Hr		VOC
15.560	Tons/Yr	12-month rolling total	VOC
102	COATING LINE "A" & DRYING OVEN		
<b>Emission Limit</b>		<b>Pollutant</b>	
500.000	PPMV	Dry basis.	SOX
0.040	gr/DRY FT3		TSP
3.550	Lbs/Hr		VOC
15.560	Tons/Yr	12-month rolling total	VOC
106	NEW COATING LINE 'B'		
<b>Emission Limit</b>		<b>Pollutant</b>	
500.000	PPMV	Dry basis.	SOX
0.040	gr/DRY FT3		TSP
3.550	Lbs/Hr		VOC
15.560	Tons/Yr	12-month rolling total	VOC

**Site Emission Restriction Summary**

Emission Limit			Pollutant
49.500 Tons/Yr	12-month rolling basis.		VOC

**Alternative Operation Emission Restriction Summary**

Source Id	Source Description
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**SECTION H. Miscellaneous.**

- (a) The Capacity/Throughput numbers listed in Section A, the Site Inventory List, and provided in Section D of this permit for individual sources are for informational purposes only and are not to be considered enforceable limits. Enforceable emission limits are listed in the Restrictions section for each source and source group and in Section C. The emission limitations contained in Section G of this permit are for informational purposes and are not to be considered as enforceable limits.
- (b) Potential emissions of all criteria pollutants from this facility are reported to be below major source levels. This facility is therefore classified as an area source and is not subject to the requirements of 40 CFR 63 - Subpart KKKK, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans.
- (c) Permit was administratively amended on November 29, 2005 to document the change of Responsible Official and Permit Contact.
- (d) This permit was administratively amended on February 16, 2017 to change the ownership from Select Industries to Metal Litho and Laminating, LLC dba Select Metal Litho Greenville. The new tax ID is 81-4241865-1. John R. Frangakis, CEO delegated Thomas J. Andamasaris, Plant Manager as the responsible official.
- (e) This permit was administratively amended on September 7, 2022 to incorporate the requirements of plan approval 43-273A.
- (f) This permit was administratively amended on April 5, 2024 to incorporate the change of responsible official.



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

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