



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

STATE ONLY SYNTHETIC MINOR OPERATING PERMIT

Issue Date: December 20, 2024

Effective Date: December 26, 2024

Expiration Date: December 25, 2029

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

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

State Only Permit No: 46-00026

Synthetic Minor

Federal Tax Id - Plant Code: 23-2863392-1

Owner Information

Name: GLOBAL PKG INC
Mailing Address: 209 BROWER AVE
OAKS, PA 19456

Plant Information

Plant: GLOBAL PKG/OAKS
Location: 46 Montgomery County 46957 Upper Providence Township
SIC Code: 2759 Manufacturing - Commercial Printing, Nec

Responsible Official

Name: MICHAEL J FROST
Title: PRES
Phone: (610) 666 - 1608 Email: Michael.Frost@glopkg.com

Permit Contact Person

Name: KATE SCHAEFFER
Title: EHS MANAGER
Phone: (484) 831 - 1119 Email: Kate.Schaeffer@glopkg.com

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



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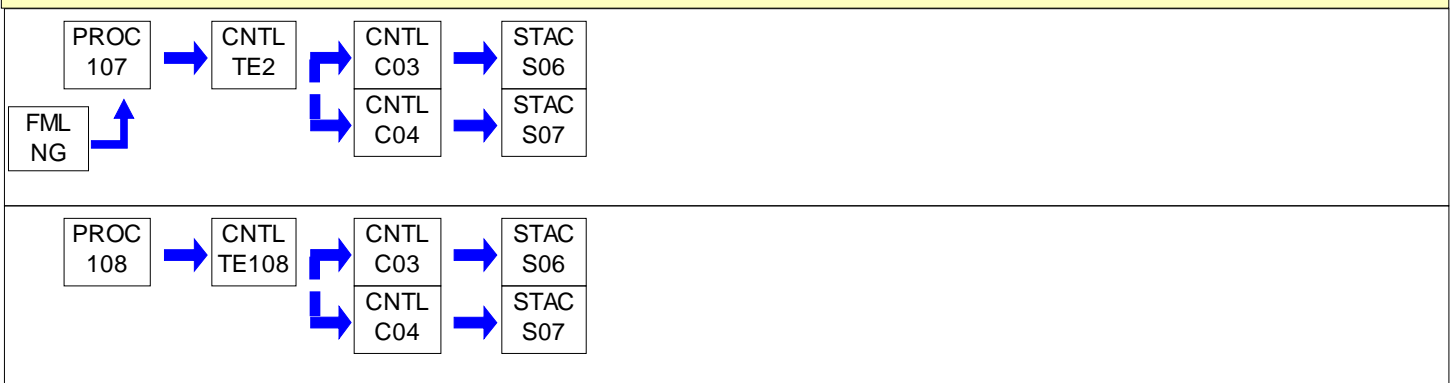
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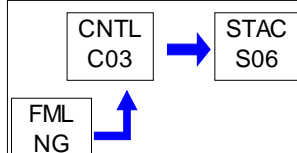
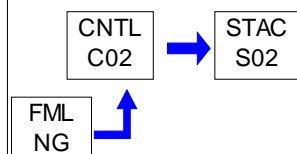
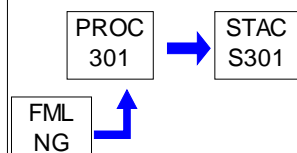
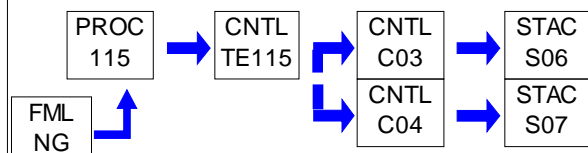
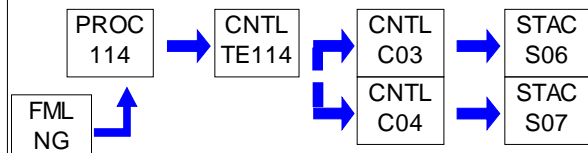
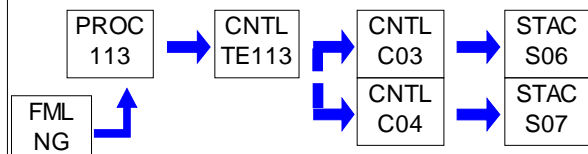
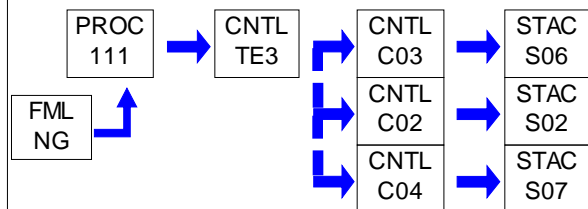
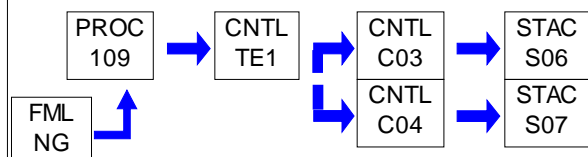
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
107	W&H PRIMAFLEX 1	72.600 Lbs/HR	
108	FUSION PRESS & DRYER	112.000 Lbs/HR	INK
109	W&H MIRAFLEX FLEXO PRESS		
111	WINDMOELLER & HOELSCHER NOVAFLEX PRESS 1 #111	2.048 MCF/HR	natural gas
		30.000 Lbs/HR	ink
113	W&H MIRAFLEX FLEXOGRAPHIC PRESS		
114	(W&H) MIRAFLEX FLEXO PRESS & DRYER	0.512 MMBTU/HR	
		N/A	INK/SOLVENT
		N/A	
115	NOVOFLEX 2 PRESS	0.512 MMBTU/HR	
		N/A	INK/SOLVENT
301	EXEMPT EMERGENCY GENERATOR	1.000 CF/HR	Natural Gas
C02	CATALYTIC OXIDIZER-ANGUIL	1.000 CF/HR	Natural Gas
C03	MEGTEC REGENERATIVE THERMAL OXIDIZER	1.000 Cu Yd/HR	Natural Gas
C04	TANN REGENERATIVE THERMAL OXIDIZER	1.000 CF/HR	Natural Gas
TE1	TOTAL ENCLOSURE MIRAFLEX 1 PRESS		
TE108	TOTAL ENCLOSURE - FUSION PRESS CAPTURE SYSTEM		
TE113	TOTAL ENCLOSURE FOR PRESS NO. 113		
TE114	TOTAL ENCLOSURE MIRAFLEX 3 PRESS		
TE115	TOTAL ENCLOSURE NOVOFLEX 2		
TE2	W&H PRIMAFLEX TOTAL ENCLOSURE		
TE3	TOTAL ENCLOSURE NOVOFLEX 1		
NG	NATURAL GAS		
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S07	TANN REGENERATIVE THERMAL OXIDIZER STACK		
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PERMIT MAPS

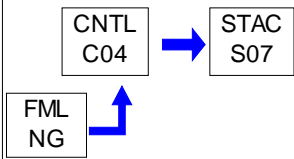


PERMIT MAPS





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_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

(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**

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

- (a) construction or demolition of buildings or structures;
- (b) grading, paving and maintenance of roads and streets;
- (c) use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets;
- (d) clearing of land;
- (e) stockpiling of materials;
- (f) open burning operations, as specified in 25 Pa. Code § 129.14;
- (g) N/A
- (h) N/A
- (i) sources and classes of sources other than those identified in (1)-(8), above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (1) the emissions are of minor significance with respect to causing air pollution; and
 - (2) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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

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

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

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

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

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

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

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

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

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

**SECTION C. Site Level Requirements**

fugitive emissions).

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

- (a) The permittee shall ensure that the total VOC emissions from the facility shall not exceed 24.99 tons in any 12 consecutive month period.
- (b) Individual HAP emissions from the entire facility shall not exceed 9.99 tons in any 12 consecutive month period.
- (c) Total HAP emissions from the entire facility shall not exceed 24.99 tons in any 12 consecutive month period.
- (d) De minimis sources categories:
- (1) The permittee shall limit the VOC emission from each of the following sources to less than three (3) pounds per hour, fifteen (15) pounds per day and 2.7 tons in any 12 consecutive month period.
- (A) Cleaning operations including the cleaning of Nordmeccanica Solventless Laminator.
(B) Space heaters (12) & heat pump,
(C) Ink Mixing and Storage Room,
(D) PRI Solvent Distillation Unit,
- (2) The emissions from the de minimis sources are to be included in the total emissions of (a), (b), and (c), above.

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

Facility-wide emissions include emissions from the source(s) listed in this operating permit, all sources listed in Section A of the facility-wide operating permit No. 46-00026, as well as miscellaneous sources exempt from plan approval requirements which are listed in Section H of the facility-wide operating permit No. 46-00026.

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

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

010 [25 Pa. Code §129.14]**Open burning operations**

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

- (a) a fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer;
- (b) any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department;
- (c) a fire set for the prevention and control of disease or pests, when approved by the Department;
- (d) a fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation;



SECTION C. Site Level Requirements

- (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; or
- (g) a fire set solely for cooking food.

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.

011 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

- (a) a device approved by the Department and maintained to provide accurate opacity measurements; or
- (b) observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall maintain monthly records of the aggregate NOx emissions from all exempt engines on site including pounds per hour, pounds per day, ozone season (i.e., the period from May 1 through September 30 of each year) sums, and 12-month rolling sums to demonstrate compliance with the NOx emission limits applicable to this source.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) 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:

- (1) Date, time, and location of the incident(s)
- (2) The cause of the incident(s)
- (3) The corrective action taken, if necessary to abate the situation and prevent future occurrences.

(b) The permittee shall keep records of facility wide VOC, individual HAP, and total HAP emissions on a monthly basis and as a 12-month rolling sum.

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.

**SECTION C. Site Level Requirements**

(d) increases resulting from the issuance of a plan approval and subsequent operating permit.

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

The permittee shall record total VOC and HAP emissions, from the facility, as a monthly total and as a 12-month rolling sum.

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

The permittee shall calculate and record the VOC emissions from all inks on a monthly and 12-month rolling sum basis using DEP approved methods.

The following is DEP's approved method for determining the ink VOC emissions:

- a. Assess the 20 most used inks monthly using purchase data.
- b. Identify the ink with the highest VOC content, where the highest VOC content is determined from the monthly assessment of the 20 most used inks. A record shall be maintained of these 20-most used inks.
- c. Multiply the total facility-wide ink throughput (based upon purchase data) by the highest VOC content identified above to calculate pre-control emissions.
- d. Multiply the pre-control emissions by $(1 - E)$ to calculate controlled emissions, where E is the DEP most recently approved control efficiency of the lower-performing of the regenerative thermal oxidizers, C03 and C04.

V. REPORTING REQUIREMENTS.

017 [25 Pa. Code §127.441]
Operating permit terms and conditions.

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

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

- (c) The report shall describe the following:
- (1) name, permit or authorization number, and location of the facility;
 - (2) nature and cause of the malfunction, emergency or incident;
 - (3) date and time when the malfunction, emergency or incident was first observed;
 - (4) expected duration of excess emissions;
 - (5) estimated rate of emissions; and
 - (6) corrective actions or preventative measures taken.

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph

**SECTION C. Site Level Requirements**

(b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

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

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

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

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

[Additional authority for this permit condition is also derived from 40 C.F.R. 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 C.F.R. 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 C.F.R. Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 C.F.R. § 68.130 is present in a process in more than the threshold quantity at a facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:

- (i) Three years after the date on which a regulated substance is first listed under 40 C.F.R. § 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 C.F.R. §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 C.F.R. § 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 C.F.R. 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 C.F.R. Part 68 by the date specified in 40 C.F.R. §68.10(a); or,

(2) Certify that this facility is in compliance with all requirements of 40 C.F.R. Part 68 including the registration and submission of the RMP.

(e) If this facility is subject to 40 C.F.R. Part 68, the permittee shall maintain records supporting the implementation of an

**SECTION C. Site Level Requirements**

accidental release program for five (5) years in accordance with 40 C.F.R. §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 C.F.R. Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to register and submit the RMP or a revised plan pursuant to 40 C.F.R. Part 68.

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

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

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

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

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

(b) The following work practice standards shall be followed:

- (1) All VOC-containing materials shall be stored in closed, nonabsorbent, non-leaking containers when not being mixed or transferred to another container.
- (2) Cloth and paper, or other absorbent applicators, moistened with coatings, solvents or cleaning solvents, shall be stored in closed, nonabsorbent, non-leaking containers.
- (3) All spills that may cause air pollutant emissions shall be cleaned up promptly.

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

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

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

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

**SECTION C. Site 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).

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: 107

Source Name: W&H PRIMAFLEX 1

Source Capacity/Throughput: 72.600 Lbs/HR

Conditions for this source occur in the following groups: 2

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (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 source consists of one flexographic printing press, manufactured by Windmoeller & Hoelscher Co., Model Primaflex, installation date: 2007.

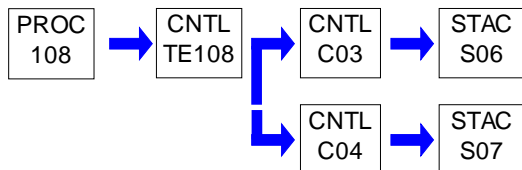
**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: FUSION PRESS & DRYER

Source Capacity/Throughput: 112.000 Lbs/HR INK

Conditions for this source occur in the following groups: 2

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (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 source consists of one flexographic printing press, manufactured by the Paper Converting Machine Company (PCMC), Model: Fusion, installation date: 2010.

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

**SECTION D. Source Level Requirements**

The dryers for this source are electric, not fired by natural gas.

**SECTION D. Source Level Requirements**

Source ID: 109

Source Name: W&H MIRAFLEX FLEXO PRESS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (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 source consists of one flexographic printing press, manufactured by Windmoeller & Hoelscher Co., Model Miraflex, installation date: 2012.

**SECTION D. Source Level Requirements**

Source ID: 111

Source Name: WINDMOELLER & HOELSCHER NOVAFLEX PRESS 1 #111

Source Capacity/Throughput:

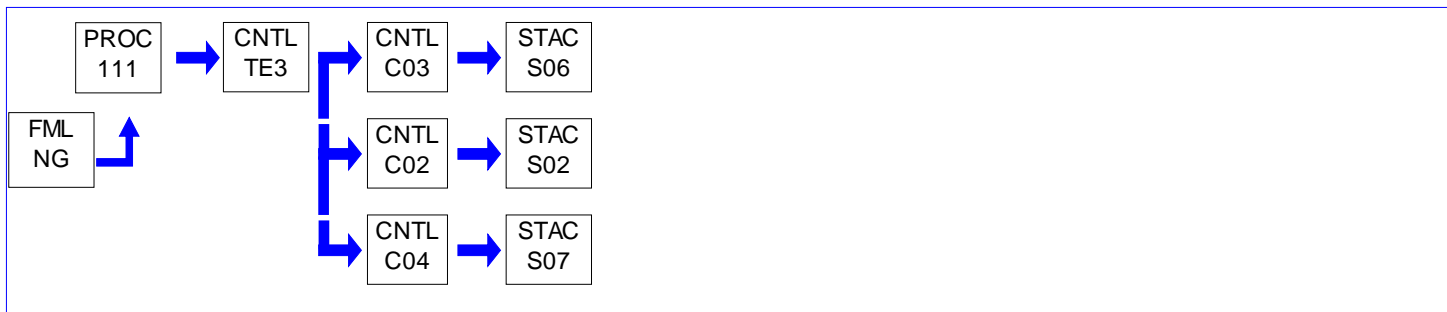
2.048 MCF/HR

natural gas

30.000 Lbs/HR

ink

Conditions for this source occur in the following groups: 2

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (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 source consists of one flexographic printing press, manufactured by Windmoeller & Hoelscher Co., Model Novaflex, installation date: 2007.

**SECTION D. Source Level Requirements**

Source ID: 113

Source Name: W&H MIRAFLEX FLEXOGRAPHIC PRESS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: 2

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this permit including Section B (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 source consists of one flexographic printing press, manufactured by Windmoeller & Hoelscher Co., Model: Miraflex AM-10, installation date: 2016.

**SECTION D. Source Level Requirements**

Source ID: 114

Source Name: (W&H) MIRAFLEX FLEXO PRESS & DRYER

Source Capacity/Throughput:

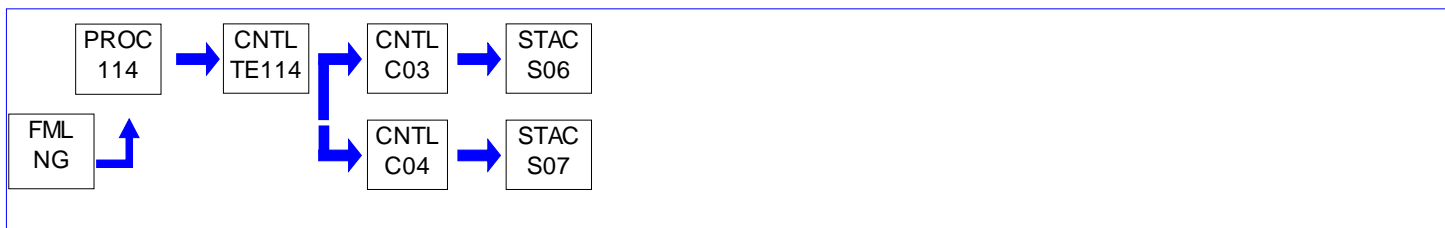
0.512 MMBTU/HR

N/A

INK/SOLVENT

N/A

Conditions for this source occur in the following groups: 2

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The total oxidizer stack emissions attributable to this press (including those from cleanup operations) shall not exceed:
0.44 tons of NO_x in any 12 consecutive month 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) 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.

**SECTION D. Source Level Requirements**

This source consists of one flexographic printing press, manufactured by Windmoeller & Hoelscher Co., Model: Miraflex Flexo Press & Dryer.

**SECTION D. Source Level Requirements**

Source ID: 115

Source Name: NOVOFLEX 2 PRESS

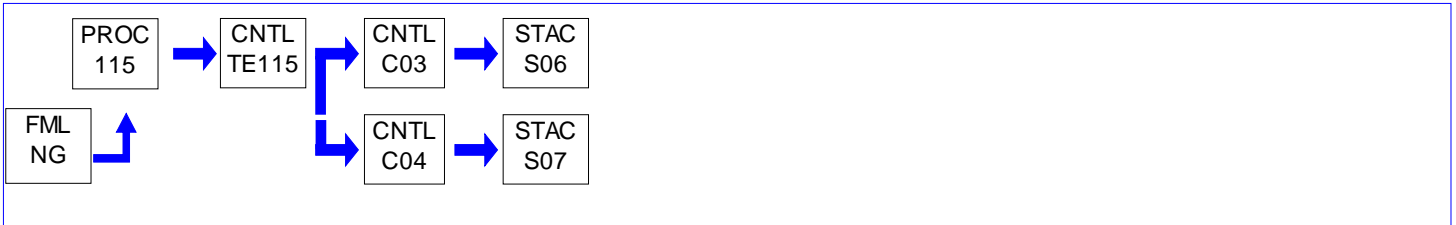
Source Capacity/Throughput:

0.512 MMBTU/HR

N/A

INK/SOLVENT

Conditions for this source occur in the following groups: 2

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The total oxidizer stack emissions attributable to this press (including those from cleanup operations) shall not exceed any of the following:

0.867 tons of NO_x in any 12 consecutive month 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) 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.

**SECTION D. Source Level Requirements**

This source is composed of the following:

One (1) W&H Novoflex II L8 press. This press is an 8-station, central impression flexographic press with a maximum web width of 67 inches and a maximum printing width of 65 inches. The ink drying system is natural gas-fired and includes two Maxon ValuPak 300 burners. Each burner has a rated heat input of 989,521 BTU/hr.

**SECTION D. Source Level Requirements**

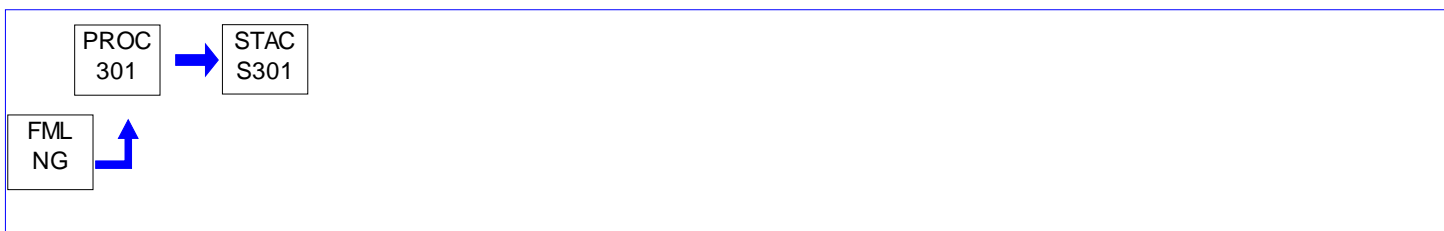
Source ID: 301

Source Name: EXEMPT EMERGENCY GENERATOR

Source Capacity/Throughput:

1.000 CF/HR

Natural Gas

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

**# 001 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4233]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?**

In accordance with 40 CFR 60.4233(d) the permittee shall comply with the following hydrocarbons + oxides of nitrogen (HC + NOx) and carbon monoxide (CO) emission standards when burning Natural Gas:

HC + NOx: 10.0 g/HP-hr
CO: 387 g/HP-hr

Fuel Restriction(s).

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

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

- The permittee shall use only natural gas as fuel for this source, except as permitted in Condition #003.
- The permittee shall notify DEP before burning any other fuel, for example LPG, in this engine.

**# 003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?**

The permittee may operate this source using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of 40 CFR §60.4233.

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

- 1) The permittee shall record the operating time for this engine on a monthly and 12-month rolling basis.
- 2) The permittee shall maintain these records and make them available to the Department upon request.

005 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]**Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?**

In accordance with §60.4243(b), the permittee shall demonstrate compliance with the standards specified in Condition #001 according to one of the methods given below:

- (1) Purchasing an engine certified according to procedures specified in 40 CFR Part 60, Subpart JJJJ, for the same model year and demonstrating compliance according to one of the methods specified in 40 CFR Part 60.4243(a).
- (2) Purchasing a non-certified engine and demonstrating compliance with the emission standards specified in §60.4233(d) and according to the requirements specified in §60.4244, as applicable, and according to the following:

The permittee shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.

006 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4245]**Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?**

The permittee shall keep records of the following information:

- (1) All notifications submitted to comply with 40 CFR Part 60 Subpart JJJJ and all documentation supporting any notification.
- (2) Maintenance conducted on the engine.
- (3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.
- (4) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR §60.4243(a)(2), documentation that the engine meets the emission standards.

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

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

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

008 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4243]**Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines****What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?**

(a) The permittee shall operate the emergency stationary R.I.C.E. according to the requirements in the most recent version of 40 C.F.R. Section 60.4243(d).

(b) If the permittee does not operate the engine according to the requirements of 40 C.F.R. Section 60.4243(d), the engine will not be considered an emergency engine under 40 C.F.R. Part 60 Subpart JJJJ and must meet all requirements for non-emergency engines.

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

This source consist of one (1) Generac, Model RG030 emergency generator manufactured in June 2014 and rated at 30 kW and 60 Hz.

**SECTION D. Source Level Requirements**

Source ID: C02

Source Name: CATALYTIC OXIDIZER-ANGUIL

Source Capacity/Throughput:

1.000 CF/HR

Natural Gas

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

During back-up operation the emissions from this oxidizer shall not exceed any of the following:

- (1) 8.5 lbs/hr of VOC;
- (2) 7.7 tons of VOC in any 12 consecutive month period; and
- (3) 2.9 tons of NOx (dryer + oxidizer) in any 12 consecutive month period.

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

When Source ID 111 is operating the emissions from this oxidizer shall not exceed:

2.9 tons of NOx (dryer + oxidizer) in any 12 consecutive month period.

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

The catalytic oxidizer shall fire natural gas only.

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

For Source ID 111 only, the catalytic oxidizer shall be operated:

- (a) as a backup when the RTO (C03) or RTO (C04) is down for maintenance or repair; and
- (b) to maintain the catalytic bed inlet instantaneous air temperature (not the setpoint) at a minimum of 600°F, when operating, to achieve at least 96 percent VOC Overall Control Efficiency (OCE) or 20 ppmvd (as carbon).

[Compliance with this streamlined condition, assures compliance with 25 Pa. Code 129.67a(c)(3).]

- (c) to maintain the catalytic bed inlet air temperature at a minimum of 600°F for at least 30 minutes after the last application of ink or cleanup solvents.

**SECTION D. Source Level Requirements**

Note: Overall Control Efficiency (OCE) = Capture Efficiency (CE) * Destruction Efficiency (DE)

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

The catalytic oxidizer (Source ID C02) shall be equipped with a temperature monitoring, reading, and recording device to continuously measure and record the catalytic inlet air temperature.

The air flow from the presses to the oxidizer shall be continuously monitored while the presses are running.

006 [25 Pa. Code §129.67a]**Control of VOC emissions from flexible packaging printing presses.**

This control device shall be equipped with the temperature monitoring equipment and the temperature monitoring equipment shall be installed, calibrated, operated and maintained according to manufacturer's specifications at all times the oxidizer is in use.

007 [25 Pa. Code §129.67a]**Control of VOC emissions from flexible packaging printing presses.**

The permittee shall perform the following monitoring for this control device:

1. The inlet gas temperature must be continuously monitored.
2. A catalyst activity test shall be performed a minimum of once per rolling 2-year period.

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

(a) The permittee shall, when the catalytic oxidizer (Source ID C02) is operated, keep records of the catalytic oxidizer inlet air temperature.

(b) The temperature reading shall be recorded at least once every 15 minutes while the oxidizer is operating.

(c) The permittee shall calculate and record monthly and 12-month rolling VOC emissions.

009 [25 Pa. Code §129.67a]**Control of VOC emissions from flexible packaging printing presses.**

1) The following records must be kept for this control device:

- a. Temperature reading of the oxidizer.
- b. Maintenance performed on the oxidizer and monitoring equipment, including the date and type of maintenance.
- c. Catalyst activity test performed.

**SECTION D. Source Level Requirements**

2) The records must be maintained for five years and shall be submitted to the DEP in an acceptable format upon receipt of a written 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.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The catalytic oxidizer shall be operated and maintained in accordance with manufacturers' specifications and good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

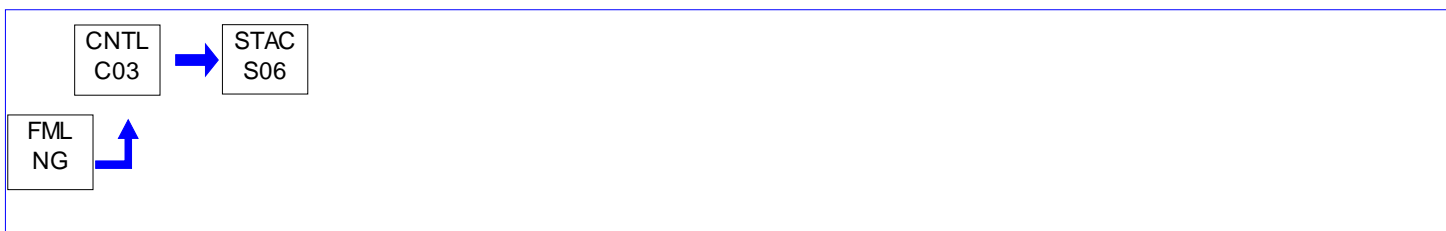
This source consists of one (1) Anguil catalytic oxidizer, Model No. 100, with a single Eclipse burner rated at 4.0 mmBtu/hr, and a maximum design flow rate of 10,000 scfm. This unit was installed in 2003 and burns natural gas.

**SECTION D. Source Level Requirements**

Source ID: C03

Source Name: MEGTEC REGENERATIVE THERMAL OXIDIZER

Source Capacity/Throughput: 1.000 Cu Yd/HR Natural Gas

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

(a) When operating the regenerative thermal oxidizer (RTO), the permittee, shall maintain a minimum 3-hour rolling combustion chamber temperature equal to no less than 50 °F below the 3-hour average temperature demonstrated during the most recent compliant source test approved by DEP.

Note: On 14 October 2020, DEP approved the performance test conducted on 13-14 June 2018, during which the 3-hour average combustion chamber temperature, for C03, was 1,600 °F

[Compliance with this streamlined condition assures compliance with 25 Pa. Code 129.67a(d)(2).]

(b) The regenerative thermal oxidizer (RTO Source ID C03) shall be operated to maintain:

- 1) The total air flow from all the presses to the RTO shall not exceed 25,000 cfm.
- 2) The RTO is required to achieve VOC emission Overall Control Efficiencies (OCE) as follows:

- i) 96 percent for Source IDs 107, and 111;
- ii) 98 percent or a post control non-methane hydrocarbon (NMHC) emission of 20 ppmvd as methane, whichever is less stringent, for Source IDs 108, 109, 113, 114 and 115.

[Compliance with this streamlined condition, assures compliance with 25 Pa. Code 129.67a(c)(3).]

(c) The permittee shall not apply any ink and/or solvent before the RTO combustion zone temperature reaches the minimum temperature defined in Condition #002(a).

(d) VOC emissions from the press shall not bypass the total enclosure and the RTO.

(e) The RTO shall be operated to maintain the minimum combustion zone temperature defined in Condition #002(a) when the press is operating and cleanup solvents are used in side the permanent total enclosure.

(f) The total enclosure and the RTO shall be operated for at least 30 minutes after the last VOC and/or HAP application.

Note: Overall Control Efficiency (OCE) = Capture Efficiency (CE) * Destruction Efficiency (DE)

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

(a) The permittee shall perform a stack test using Department-approved procedures once every five (5) calendar years,

**SECTION D. Source Level Requirements**

where five (5) calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five (5) years later. In accordance with 25 Pa. Code § 139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. Refer to PADEP Source Testing Program website online for further information related to source testing including Source Testing FAQ and the PADEP Source Testing Manual.

(b) The stack test shall, at a minimum, test for overall control efficiency (OCE) and VOC emissions.

1) The overall control efficiency (OCE) shall be determined by the following test methods and procedures:

- i) The capture efficiency (CE) shall be determined in accordance with 40 CFR Part 51, Appendix M, Methods 204, including updates and revisions.
- ii) The control (destruction) efficiency (DE) shall be determined simultaneously (during the same test program) with the capture efficiency and shall be performed in accordance with 25 Pa. Code 129.67a(f)(2).

2) The VOC emissions test shall be conducted in accordance with the provisions of EPA method 25A and Department Source Testing Manual (Document No. 174-0300-002) or other Department approved methodology and 25 Pa. Code Chapter 139.

(c) The Performance Test shall be conducted on this RTO while the maximum possible number of presses are operating at maximum routine operating conditions such that the inlet volumetric flow rate of this RTO does not exceed 25,000 scfm or under such other conditions, within the capacity of the equipment, as may be requested by the Department. (Please see Section VII, Issue 5, page 15 (Representative Testing Conditions) in the EPA Clean Air Act National Stack Testing Guidance).

(d) The following process data shall be recorded during each test run to document the operation of the flexographic press:

- (1) Line speed (fpm)
- (2) Web width
- (3) Ink usage
- (4) Number of colors
- (5) Press downtime (minutes)

(e) The RTO operating temperature (°F) shall be recorded in fifteen (15) minute intervals during each test run to document the operation of the RTO.

(f) Tests shall also be conducted in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance.

(g) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(h) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(i) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(j) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

003 [25 Pa. Code §129.51]

General

**SECTION D. Source Level Requirements**

- (a) The permittee shall perform an Overall Control Efficiency (OCE) test on the regenerative thermal oxidizer (Source ID C03) every five (5) years or once within the life of the permit. Such testing shall be conducted at least 12 months prior to the expiration of this permit. The stack test results shall be submitted to the Department for review no later than 6 months before the permit expiration date.
- (b) The VOC capture efficiency (CE) shall be conducted in accordance with the provisions of EPA Test Method 204.
- (c) The VOC destruction efficiency (DE) shall be conducted in accordance with the provisions of EPA Test Method 25A and/or 25 Pa. Code Chapter 139.
- (d) To the extent possible the source testing shall be performed while all seven (7) cold parts washers are operating at maximum normal operating conditions.
- (e) The following process data shall be recorded during each test run to document the operation of the cold parts washers: solvent temperature.
- (f) This test shall be conducted concurrently with the stack test specified in Condition #003.
- (g) Records of OCE, CE & DE test results shall be maintained and made available to DEP upon request.

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

The RTO shall be equipped with devices to continuously monitor and record the combustion chamber temperature (°F) and the inlet airflow rate (dscfm).

The air flow from the presses to the oxidizer shall be continuously monitored while the presses are running.

005 [25 Pa. Code §129.67a]**Control of VOC emissions from flexible packaging printing presses.**

This control device shall be equipped with the temperature monitoring equipment and the temperature equipment shall be installed, calibrated, operated and maintained according to manufacturer's specifications at all times the oxidizer is in use.

006 [25 Pa. Code §129.67a]**Control of VOC emissions from flexible packaging printing presses.**

The minimum combustion or operating temperature, of this control device, must be continuously monitored.

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

1) The following records must be kept for this control device:

- a. 15-minute temperature readings of the oxidizer combustion zone.
- b. Maintenance performed on the oxidizer and monitoring equipment, including the date and type of maintenance.
- c. RTO start-up and shut-down times

**SECTION D. Source Level Requirements**

2) The records must be maintained for five years and shall be submitted to the DEP in an acceptable format upon receipt of a written request.

Compliance with this streamline condition assures compliance with 25 Pa. Code §129.67a

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

(a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.) to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region
RA-EPSEstacktesting@pa.gov

Central Office
RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.

1. Test Date(s)

- a. For protocols, provide the proposed date on which testing will commence or "TBD"
- b. For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

4. Testing Requirements (all that apply)

- a. Plan approval number(s)
- b. Operating permit number
- c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- d. Special purpose(s) (Consent Order, RFD, RACT, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

009 [25 Pa. Code §129.67a]**Control of VOC emissions from flexible packaging printing presses.**

Reports of Overall Control Efficiency (OCE) testing must be submitted to DEP in accordance with 25 Pa. Code, Chapter 139.

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall operate and maintain the RTO in accordance with manufacturer's specifications and good air pollution control practices.

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

(a) One or both RTOs shall be operating when any of the presses are operating.

(b) The permittee shall install pressure sensors in the inlet duct to each RTO in order to control the variable frequency drive (VFD) of the fans to direct the emissions from the presses to either one or both RTOs simultaneously. The presses and RTOs may operate in the following scenarios:

(1) All seven presses operating and controlled by CO3, as long as the total inlet volume to the Megtec RTO is less than 25,000 scfm.

(2) Several presses operating and controlled by CO4, as long as the total inlet volume to the TANN RTO is less than 15,000 scfm.

(3) All presses operating and controlled by both RTOs in parallel subject to the limitation that the total inlet volume to the Megtec RTO (C03) is less than 25,000 scfm and the total inlet volume to the TANN RTO (C04) is less than 15,000 scfm.

(4) When one or both of the RTOs are down, the Catalytic Oxidizer (C02) shall be operated and the permittee shall ensure that the combined maximum air flow(s) from the presses do not exceed the rated capacity of the control device(s).

(c) The permittee shall install airflow monitoring devices at the inlet of each RTO.

(d) In the event that the flow rate exceeds the RTOs maximum flow rate the RTO control system shall initiate a shutdown of a sufficient number of presses until the flow drops below the RTO maximum flow rate limit.

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

The permittee shall follow the following procedures if an excursion occurs to the RTO.

(a) The permittee shall curtail its operation as soon as possible and not to exceed 15 minutes. No new material may be fed to the presses after 15 minutes.

(b) Should the permittee continue to operate the presses to evacuate all the material already fed into the presses, then all emissions associated with this excursion process during the "run out" shall be considered fugitive.

(c) The Department defines the word excursion as a 3-hour average temperature below the minimum temperature specified in Condition #002(a).

VII. ADDITIONAL REQUIREMENTS.**# 013 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source consists of one (1) Megtec regenerative thermal oxidizer, Model No. CS-250, with a single burner rated at 4.8 mmBtu/hr, and a maximum design flow rate of 25,000 scfm. This unit burns natural gas.

**SECTION D. Source Level Requirements**

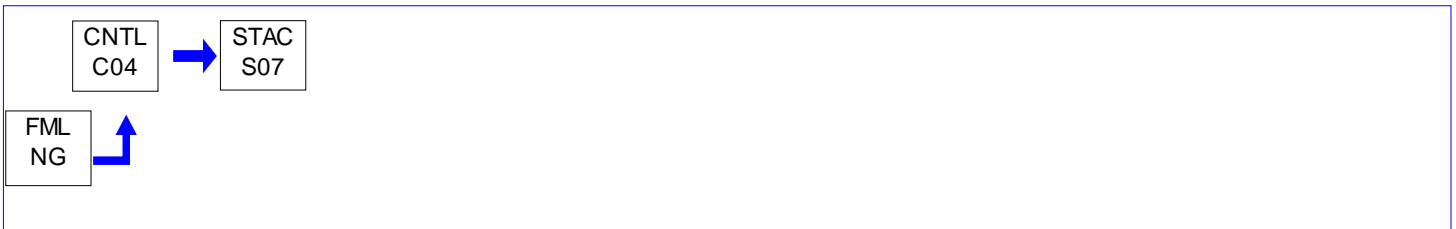
Source ID: C04

Source Name: TANN REGENERATIVE THERMAL OXIDIZER

Source Capacity/Throughput:

1.000 CF/HR

Natural Gas

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The RTO burner shall fire natural gas only.

Control Device Efficiency Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) When operating the regenerative thermal oxidizer (RTO), the permittee, shall maintain a minimum 3-hour rolling combustion chamber temperature equal to no less than 50 °F below the 3-hour average temperature demonstrated during the most recent compliant source test approved by DEP. The 3-hour average shall be calculated each hour. The permittee shall not vent any VOC emissions from the presses to the RTO until the minimum temperature is reached.

Note: On 14 October 2020, DEP approved the performance test conducted on 13-14 June 2018, during which the 3-hour average combustion chamber temperature, for C04, was 1,555 °F.

[Compliance with this streamlined condition assures compliance with 25 Pa. Code 129.67a(d)(2).]

(b) The RTO shall maintain at least a 98% VCO Overall Control Efficiency (OCE) or a post control minimum outlet VOC concentration not to exceed 20 ppm as methane on a dry basis, for all sources controlled by this RTO.

[Compliance with this streamlined condition, assures compliance with 25 Pa. Code 129.67a(c)(3).]

(c) VOC emissions from the press shall not bypass the total enclosure and the RTO.

(d) The dryer(s), total enclosure and the RTO shall be operated for at least 30 minutes after the last VOC and/or HAP application.

Note: Overall Control Efficiency (OCE) = Capture Efficiency (CE) * Destruction Efficiency (DE)

II. TESTING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall perform a stack test using Department-approved procedures once every five (5) calendar years, where five (5) calendar years is defined as beginning with the calendar year the latest stack test was performed and ending on December 31, five (5) years later. In accordance with 25 Pa. Code § 139.11(1), performance tests shall be conducted

**SECTION D. Source Level Requirements**

while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department. Refer to PADEP Source Testing Program website online for further information related to source testing including Source Testing FAQ and the PADEP Source Testing Manual.

(b) The stack test shall, at a minimum, test for overall control efficiency (OCE) and VOC emissions.

1) The overall control efficiency (OCE) shall be determined by the following test methods and procedures:

i) The capture efficiency (CE) shall be determined in accordance with 40 CFR Part 51, Appendix M, Methods 204, including updates and revisions.

ii) The control (destruction) efficiency (DE) shall be determined simultaneously (during the same test program) with the capture efficiency and shall be performed in accordance with 25 Pa. Code 129.67a(f)(2).

2) The VOC emissions test shall be conducted in accordance with the provisions of EPA method 25A and Department Source Testing Manual (Document No. 174-0300-002) or other Department approved methodology and 25 Pa. Code Chapter 139.

(c) The Performance Test shall be conducted on this RTO while the maximum possible number of presses are operating at maximum routine operating conditions such that the inlet volumetric flow rate of this RTO does not exceed 15,000 scfm or under such other conditions, within the capacity of the equipment, as may be requested by the Department. (Please see Section VII, Issue 5, page 15 (Representative Testing Conditions) in the EPA Clean Air Act National Stack Testing Guidance).

(d) The following process data shall be recorded during each test run to document the operation of the flexographic press:

- (1) Line speed (fpm)
- (2) Web width
- (3) Ink usage
- (4) Number of colors
- (5) Press downtime (minutes)

(e) The RTO operating temperature (°F) shall be recorded in fifteen (15) minute intervals during each test run to document the operation of the RTO.

(f) Tests shall also be conducted in accordance with the provisions of the current version of the DEP Source Testing Manual and the EPA Clean Air Act National Stack Testing Guidance.

(g) At least ninety (90) days prior to the test, the permittee shall submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of sampling ports and other data to ensure the collection of representative samples.

(h) At least thirty (30) days prior to the test, the Regional Air Quality Manager, shall be informed of the date and time of the test.

(i) Within sixty (60) days after the source test(s) (unless a more stringent regulatory requirement applies), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

(j) In the event that any of the above deadlines cannot be met, the permittee may request an extension for the due date(s) in writing and include a justification for the extension. The Department may grant an extension for a reasonable cause.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall email all source test submissions (notifications, protocols, reports, supplemental information, etc.)

**SECTION D. Source Level Requirements**

to both the AQ Program Manager for the Southeast Regional Office and the PSIMS Administrator in Central Office (email addresses are provided below). Any questions or concerns about source testing submissions can be sent to RA-EPstacktesting@pa.gov and the PSIMS Administrator will address them.

Southeast Region
RA-EPSEstacktesting@pa.gov

Central Office
RA-EPstacktesting@pa.gov

(b) The following pertinent information shall be listed on the title page.

1. Test Date(s)

- a. For protocols, provide the proposed date on which testing will commence or "TBD"
- b. For reports, provide the first and last day of testing

2. Facility Identification Number (Facility - ID): For test programs that were conducted under a multi-site protocol, also include the PF ID under which the protocol was stored in PSIMS, as indicated in the protocol response letter.

3. Source ID(s) for the applicable source(s) and air pollution control device(s): The term Source ID is used in the permit but "Other Id" is used in DEP electronic systems. They are the same number and must also be listed for control equipment

4. Testing Requirements (all that apply)

- a. Plan approval number(s)
- b. Operating permit number
- c. Applicable federal subpart(s) (i.e. 40 CFR 60, Subpart JJJJ)
- d. Special purpose(s) (Consent Order, RFD, RACT, Tier II, etc.)

(c) If confidential information must be submitted, submit both a public copy, which has been redacted, and a confidential copy. The cover page of each submittal should state whether it is a "Public Copy" or "Confidential Copy" and each page of the latter must be marked "CONFIDENTIAL".

005 [25 Pa. Code §129.51]

General

(a) The permittee shall perform an Overall Control Efficiency (OCE) test on the regenerative thermal oxidizer (Source ID C04) every five (5) years or once within the life of the permit. Such testing shall be conducted at least 12 months prior to the expiration of this permit. The stack test results shall be submitted to the Department for review no later than 6 months before the permit expiration date.

(b) The VOC capture efficiency (CE) shall be conducted in accordance with the provisions of EPA Test Method 204.

(c) The VOC destruction efficiency (DE) shall be conducted in accordance with the provisions of EPA Test Method 25A and/or 25 Pa. Code Chapter 139.

(d) To the extent possible the source testing shall be performed while all seven (7) cold parts washers are operating at maximum normal operating conditions.

(e) The following process data shall be recorded during each test run to document the operation of the cold parts washers: solvent temperature.

(f) This test shall be conducted concurrently with the stack test specified in Condition #004.

**SECTION D. Source Level Requirements**

(g) Records of OCE, CE & DE test results shall be maintained and made available to DEP upon request.

III. MONITORING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The RTO shall be equipped with a temperature monitoring, reading, and recording device to continuously measure and record the combustion zone temperature.

The air flow from the presses to the oxidizer shall be continuously monitored while the presses are running.

007 [25 Pa. Code §129.67a]

Control of VOC emissions from flexible packaging printing presses.

This control device shall be equipped with the temperature monitoring equipment and the temperature equipment shall be installed, calibrated, operated and maintained according to manufacturer's specifications at all times the oxidizer is in use.

008 [25 Pa. Code §129.67a]

Control of VOC emissions from flexible packaging printing presses.

The minimum combustion or operating temperature, of this control device, must be continuously monitored.

IV. RECORDKEEPING REQUIREMENTS.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall keep the following records for the RTO;

- (1) The combustion zone air temperature, continuously when the RTO is operating.
- (2) The start-up and shut-down times.
- (3) All maintenance performed on the TANN RTO and monitoring equipment, to include:
 - (i) Type of maintenance or malfunction.
 - (ii) Name and company of the person performing the maintenance.
 - (iii) Time and date of maintenance.

b) The records must be maintained for five years and shall be submitted to the DEP in an acceptable format upon receipt of a written request.

Compliance with this streamline condition assures compliance with 25 Pa. Code §129.67a.

V. REPORTING REQUIREMENTS.

010 [25 Pa. Code §129.67a]

Control of VOC emissions from flexible packaging printing presses.

Reports of Overall Control Efficiency (OCE) testing must be submitted to DEP in accordance with 25 Pa. Code, Chapter 139.

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

- (a) One or both RTOs shall be operating when any of the presses are operating.
- (b) The permittee shall install pressure sensors in the inlet duct to each RTO in order to control the variable frequency drive (VFD) of the fans to direct the emissions from the presses to either one or both RTOs simultaneously. The presses and RTOs may operate in the following scenarios:
- (1) All seven (7) presses operating and controlled by CO3, as long as the total inlet volume to the Megtec RTO is less than 25,000 scfm.
 - (2) Several presses operating and controlled by CO4, as long as the total inlet volume to the TANN RTO is less than 15,000 scfm.
 - (3) All presses operating and controlled by both RTOs in parallel subject to the limitation that the total inlet volume to the Megtec RTO (C03) is less than 25,000 scfm and the total inlet volume to the TANN RTO (C04) is less than 15,000 scfm.
 - (4) When one or both of the RTOs are down, the Catalytic Oxidizer (C02) shall be operated and the permittee shall ensure that the combined maximum air flow(s) from the presses do not exceed the rated capacity of the control device(s).
- (c) The permittee shall install airflow monitoring devices at the inlet of each RTO.
- (d) In the event that the flow rate exceeds the RTOs maximum flow rate the RTO control system shall initiate a shutdown of a sufficient number of presses until the flow drops below the RTO maximum flow rate limit.

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

The permittee shall operate and maintain the RTO in accordance with manufacturer's specifications and good air pollution control practices.

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

The permittee shall follow the following procedures if an excursion occurs to the RTO.

- (a) The permittee shall curtail its operation as soon as possible and not to exceed 15 minutes. No new material may be fed to the presses after 15 minutes.
- (b) Should the permittee continue to operate the presses to evacuate all the material already fed into the presses, then all emissions associated with this excursion process during the "run out" shall be considered fugitive.
- (c) The Department defines the word excursion as a 3-hour average temperature below the minimum temperature specified in Condition #002(a).

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

This source consists of one (1) TANN regenerative thermal oxidizer, Model No. TR1592C, the burner rated at 2.0 mmBtu/hr, and a maximum design flow rate of 15,000 scfm. This unit burns natural gas.

**SECTION E. Source Group Restrictions.**

Group Name: 2

Group Description: Presses 107,108,109, 111, 113, 114, and 115

Sources included in this group

ID	Name
107	W&H PRIMAFLEX 1
108	FUSION PRESS & DRYER
109	W&H MIRAFLEX FLEXO PRESS
111	WINDMOELLER & HOELSCHER NOVAFLEX PRESS 1 #111
113	W&H MIRAFLEX FLEXOGRAPHIC PRESS
114	(W&H) MIRAFLEX FLEXO PRESS & DRYER
115	NOVOFLEX2 PRESS

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 §127.441]****Operating permit terms and conditions.**

(i) The permittee shall use data from Certified Product Data Sheets (CPDS) and Safety Data Sheets (SDS) to determine the VOC and HAP content of as-applied inks, coatings, and other components (fountain solution, etc.) applied at this source and to calculate VOC and HAP emissions from this source.

(ii) As an alternative to the CPDS and SDS, the permittee may use USEPA Test Method 24 to determine the VOC and HAP content of the inks/coatings/other components applied at this source.

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

(a) For Thinner VOC & HAP and ink HAP, the permittee shall monitor the following information for the press on a monthly basis:

- (1) The inks and thinners consumption in pounds or gallons;
- (2) The percent by weight VOC and HAP content of the inks and thinners; and
- (3) The press operating hours.

(b) Flags shall be maintained at all natural openings to indicate the directions of air flow.

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

(a) For Thinner VOC & HAP and Ink HAP, the permittee shall keep the following records for the press on a monthly basis:

- (1) the inks, and thinners monthly consumption in pounds or gallons;
- (2) the percent by weight VOC and HAP content of the inks, and thinners and
- (3) the press operating hours.

(b) The permittee shall calculate and record the facility wide VOC and HAP emissions from all thinners and HAP emissions from all inks on a monthly and 12-month rolling sum basis.

(c) The permittee shall calculate and record the facility wide VOC emissions from all inks on a monthly and 12-month rolling

**SECTION E. Source Group Restrictions.**

sum basis using DEP approved methods in Section C, Condition #018.

(d) The permittee shall record on each operating day the air flow directions at all natural draft openings of the total enclosure, inward or outward by observing the flags at each natural draft opening.

(e) All records shall be kept in a logbook or electronic format.

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

(a) The permittee shall not apply any ink and/or solvent before the oxidizer combustion zone temperature reaches the minimum temperature defined in this permit for the oxidizer.

(b) VOC emissions from the press shall not bypass the total enclosure and the oxidizer.

(c) The total enclosure shall be operated while inks, thinners, and/or cleaning solvents are being applied.

(d) The total enclosure and the oxidizer shall be operated for at least 30 minutes after the last VOC and/or HAP application.

(e) The total enclosure shall be operated in the same manner as specified in 40 C.F.R. 60 §60.713(b)(5)(i)(A) through (D).

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

(a) Containers for inks, cleanup solvents, diluent, solvent wastes and cleanup towels shall be kept closed after solvents are transferred or waste towels are disposed into the containers.

(b) All access doors and windows of the total enclosure shall be closed during routine operations as per EPA Method 204 §5.5.

(c) The total enclosure shall be operated so that the air flows into the enclosure continuously at the natural openings.

006 [25 Pa. Code §129.67a]**Control of VOC emissions from flexible packaging printing presses.**

1) The permittee shall comply with the following work practices for cleaning activities at the facility:

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

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

c. Minimize spills of VOC-containing cleaning solutions and waste cleaning solutions and clean up spills immediately.

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

2. The requirements in Paragraph 1 apply to the following activities:

a. Cleaning of ink, coating or adhesive from a press

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

**SECTION E. Source Group Restrictions.**

c. Cleaning of ink, coating or adhesive from areas around a press.

3. The requirements in Paragraph 1 do not apply to the following activities:

- a. Cleaning electronic components of a press.
- b. Cleaning in pre-press (for example, platemaking) operations.
- c. Cleaning in post-press (for example, binding) operations.
- d. Using janitorial supplies (for example, detergents or floor cleaners) for general cleaning around a press.
- e. The use of parts washers or cold cleaners at a flexible packaging printing facility. The use of parts washers and cold cleaners is regulated under 25 Pa. Code 129.63 (relating to degreasing operations).

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

1) This source is also composed of seven (7) parts washer. The following are the press room location (Permanent Total Enclosure [TE]), solvent capacity and control devices for each parts washer in this source:

Location (press room)	Capacity (gallons)	Control Device	Installation Date	Press ID
Mira 2 TE113	42	C03,C04	October 2016	113
Fusion TE108	37	C03, C04	March 2011	108
Prima TE2	33	C02, C03, C04	August 2007	107
Novo TE3	27	C02, C03, C04	September 2004	111
Miraflex TE109	28	C03, C04	December 1997	109
Mira 3 TE114	36	C03, C04	March 2019	114
Novo 2 TE115	40	C03, C04	November 2021	115

2) All seven (7) units are immersion cleaners.

3) The solvent used in this source is a 90%-10% Propanol/Propyl acetate blend, other organic cleaning solutions may also be used; however, if any other organic cleaning solutions are used in this source the permittee shall notify DEP.

4) All units are equipped with spring-loaded, stainless-steel covers which are kept closed when not in use.

(5) This source shall:

(i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (2). In addition, the label shall include the following discretionary good operating practices:

(A) 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 parts washer.

(B) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.

(ii) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent.

(6) Parts washers shall be operated in accordance with the following procedures:

(i) 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.

(ii) Flushing of parts using a flexible hose or other flushing device shall be performed only within the parts washer. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.

(iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the parts washer.

(iv) Air agitated solvent baths may not be used.

(v) Spills during solvent transfer and use of the parts washer shall be cleaned up immediately.

(7) A person who sells or offers for sale any solvent containing VOCs for use in a parts washer shall provide, to the purchaser, the following written information:

(i) The name and address of the solvent supplier.

(ii) The type of solvent including the product or vendor identification number.

**SECTION E. Source Group Restrictions.**

(iii) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
111	WINDMOELLER & HOELSCHER NOVAFLEX PRESS 1 #111		
Emission Limit		Pollutant	
2.900 Tons/Yr	stack emissions	NOX	
7.700 Tons/Yr	12-month rolling sum	VOC	
8.500 Lbs/Hr	stack emissions	VOC	

Site Emission Restriction Summary

Emission Limit		Pollutant	
24.900 Tons/Yr	Based on a 12-month rolling sum	VOC	
24.990 Tons/Yr	Total HAP, Based on a 12-month rolling sum	Hazardous Air Pollutants	
9.990 Tons/Yr	Individual HAP, Based on a 12-month rolling sum	Hazardous Air Pollutants	



SECTION H. Miscellaneous.

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

Solvent Storage Totes (350 gallon capacity each)
Enercon Corona treater

B. The following previously issued Operating Permits serve as the basis for certain terms and conditions set forth in this Permit:

- OP 46-0026,
- Plan Approvals PA 46-0026A and 46-320-028A which were incorporated in the OP 46-0026

C. May 2007. APS: 345561, Auth: 676534. The Department amended the operating permit to incorporate plan approval 46-0026C. No other changes have taken place at this time.

D. APS ID: 345561; AUTH ID: 738854 SMOP renewal (application received on August 8, 2008) and SMOP Amendment to incorporate Plan Approval No. 46-0026D into the SMOP (application received on December 24, 2008).

E. March 9, 2009 (APS ID 345561, AUTH ID: 785510) Modification to the Operating Permit as per 25 Pa. Code Section 127.450(a)(1).

F. December 28, 2011 (APS ID 345561; AUTH ID 908182) OP Administrative amendment to incorporate Plan Approval Nos. 46-0026E and 46-0026F.

G. August 8, 2013, (AUTH ID: 991418) OP renewal.

H. May 29, 2015, (AUTH ID: 1075849) OP amendment to incorporate PA No. 46-0026G.

***** December 2019 *****

I. APS ID 345561; AUTH ID 1235270

- 1) Operating Permit renewal.
- 2) Incorporation of Plan Approval H, Source ID 113 (W&H MIRAFLEX FLEXOGRAPHIC PRESS)
- 3) Incorporation of Plan Approval I, Source ID C04 (TANN REGENERATIVE THERMAL OXIDIZER) and defined "excursion"
- 4) Added Source ID 200 COLD CLEANING MACHINES.
- 5) Added Source ID 301 Exempt Emergency Generator.
- 5) Added applicable conditions from 25 Pa. Code 129.67a.
- 6) Applied minimum temperature requirement for RTOs C03 and C04 equal to the most recently approved stack test 3-hour average temperature
- 7) Explicitly required process and temperature monitoring and total enclosure testing during stack testing of RTO C03.
- 8) Removed requirement to record individual source HAP emissions.
- 9) Control Devices C02, C03 and C04 listed separately in Section D.
- 10) All source emission limits have been moved to the oxidizer sections of the permit. The source emission limit for Source ID 108 has been deleted; it was based upon a oxidizer that is no longer used at this facility.

March 2020. APS 345561, Auth: 1307893. Administrative amendment to incorporate plan approval number 46-0026J into the SMOP.

***** October 2023 *****

K. APS ID 345561; AUTH ID 1456432, Administrative amendment to incorporate plan approval number 46-0026K into the SMOP. Also

- 1) Removed distinction between Thinner and Cleaning Solvent.
- 2) Removed requirement for daily VOC and HAP emission calculations and
- 3) Updated minimum operating temperature for Megtec (C03) and TANN (C04) thermal oxidizers.
- 4) Removed Source ID 101, PCMC No.1 Press & Dryer-Vision II.

***** November 2024 *****

L. APS ID 345561; AUTH ID 1481993, Permit Renewal. The following updates have been made in this renewal:

**SECTION H. Miscellaneous.**

- 1) Minimum combustion chamber temperatures defined for C03 and C04 based upon stack test performed on 13-14 June 2018.
- 2) Source IDs 113, 114 and 115 have been added to Group 2 and the Group name has been updated to: Presses 107,108,109, 111, 113, 114, and 115.
- 3) Source ID 111 name changed From: WINDMOELLER & HOELSCHER NOVAFLEX PRESS #104 To: WINDMOELLER & HOELSCHER NOVAFLEX PRESS 1 #111
- 4) A condition has been added to require recordkeeping of sitewide VOC and HAP emissions on a monthly and 12-month rolling sum basis.
- 5) the name of Total Enclosures: TE1, TE2, TE3, TE114 and TE115 have been changed to more closely reflect the sources name.
- 6) The permit map for the Cold Cleaning Degreasers has been updated
- 7) Added Source IDs 114 and 115 to the list of presses subject to 98 percent emission control by the Megtec RTO (C03).
- 8) Anguil catalytic oxidizer (C02) no longer controls Source ID 107; only ID 111 is connected to C02
- 9) Removed recordkeeping of solvent throughput and emission rates for the cold cleaning in Source ID 200.
- 10) Removed the requirement to keep VOC and HAP emission records from C04.
- 11) Stack testing: added reference to Section VII Issue 5, page 15, (Representative Testing Conditions) in the EPA Clean Air Act National Stack Testing Guidance.
- 12) Removed hourly and 12-month rolling VOC limits for Source IDs: 114 and 115.
- 13) Added VOC emission calculation and recordkeeping requirement to Source ID C02.
- 14) All individual press VOC emission limits (except for ID 111) have been removed.
- 15) Added requirement for inlet air flow rate to be recorded in units of scfm for C03 and C04.
- 16) Defined new VOC emission formula.



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