



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: May 31, 2022 Effective Date: July 16, 2026
Revision Date: July 16, 2026 Expiration Date: June 19, 2027
Revision Type: Amendment

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

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 09-00027

Federal Tax Id - Plant Code: 23-2056204-1

Owner Information

Name: FRES-CO SYSTEM USA, INC.
Mailing Address: 3005 STATE RD
TELFORD, PA 18969-1021

Plant Information

Plant: FRES-CO SYSTEM USA INC/TELFORD PLT
Location: 09 Bucks County 09952 West Rockhill Township
SIC Code: 2754 Manufacturing - Commercial Printing, Gravure

Responsible Official

Name: EDWARD W WALSH
Title: SR. VP., OPERATIONS
Phone: (215) 721 - 4600 Email: ewalsh@fresco.com

Permit Contact Person

Name: AUTUMN ZANDER
Title: EHS MANAGER
Phone: (215) 721 - 4600 Email: azander@fresco.com

[Signature] _____
JILLIAN A. GALLAGHER, SOUTHEAST REGION AIR PROGRAM MANAGER



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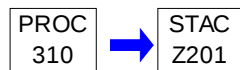
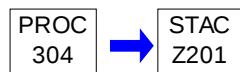
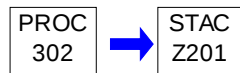
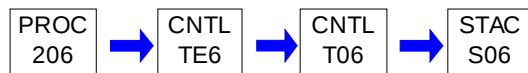
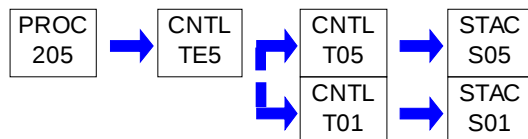
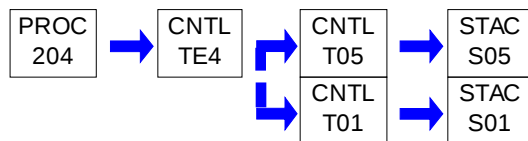
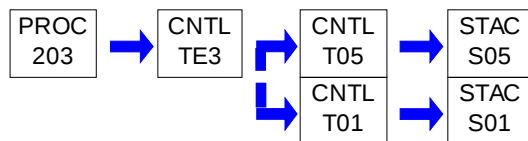
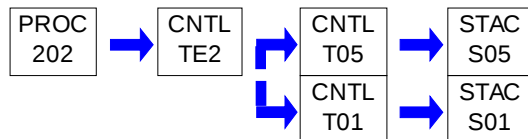
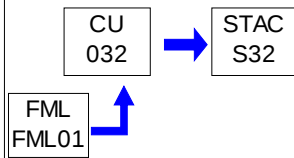
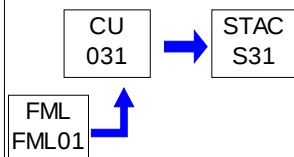
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
031	SUPERIOR BOILER 502	14.700 MMBTU/HR	
		N/A	NATURAL GAS
032	YORK SHIPLEY BOILER 501	8.400 MMBTU/HR	
		N/A	Natural Gas
202	ROTOGRAVURE PRESS (8 STATIONS)	N/A	INK SOLVENTS
203	ROTOGRAVURE PRESS (11 STATIONS)	N/A	INK SOLVENTS
204	FLEXOGRAPHIC PRESS (8 STATIONS) & 3 LAMINATORS	N/A	INK SOLVENTS
205	ROTOGRAVURE PRESS & SOLVENT DISTILLATION SYSTEM	N/A	INK USAGE
206	BOBST LAMINATOR (3 STATIONS)	N/A	INK
302	WASHROOM	N/A	SOLVENT
303	ROLLER RESURFACING		
304	MAINTENANCE ROOM PARTS WASHER		
310	INK MIXING		
901	MISCELLANEOUS RACT OP SOURCES		
904	80KW EMERGENCY GENERATOR ENGINE	0.280 MMBTU/HR	
		2.000 Gal/HR	Diesel Fuel
C05	CYCLONE/BAGHOUSE ROLLER RESURFACING		
T01	HES THERMAL OXIDIZER	94.000 Gal/HR	#2 Oil
		12.700 MCF/HR	Natural Gas
T05	ADWEST THERMAL OXIDIZER	123.000 Gal/HR	#2 Oil
		16.600 MCF/HR	Natural Gas
T06	S & S THERMAL OXIDIZER	56,000.000 MCF/HR	Natural Gas
TE2	TOTAL ENCLOSURE FOR PRESS 202		
TE3	TOTAL ENCLOSURE FOR PRESS 203		
TE4	TOTAL ENCLOSURE FOR PRESS 204		
TE5	TOTAL ENCLOSURE FOR PRESS 205		
TE6	TOTAL ENCLOSURE FOR PRESS 206		
FML01	NATURAL GAS		
FML04	DIESEL FUEL		
S01	HES THERMAL OXIDIZER STACK		
S05	ADWEST THERMAL OXIDIZER STACK		
S06	S & S THERMAL OXIDIZER STACK		
S31	BOILER 502 STACK		
S32	BOILER 501 STACK		
S904	EMERGENCY GENERATOR ENGINE STACK		
Z03	ROLLER RESURFACING PM EMISSIONS		
Z201	FUGITIVE EMISSIONS		

PERMIT MAPS



PERMIT MAPS



**PERMIT MAPS**

PROC
901 → STAC
Z201

PROC
904 → STAC
S904

FML
FML04 ↗

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

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

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

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. §§ 4001-4015).

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

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

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

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

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

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

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

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

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

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

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

(1) The Department determines that no other change in the permit is necessary;

(2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit

**SECTION B. General Title V Requirements**

responsibility, coverage and liability between the current and the new permittee; and,

(3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.

(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]**Inspection and Entry**

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

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

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

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

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

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

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

#008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]**Compliance Requirements**

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

(1) Enforcement action

(2) Permit termination, revocation and reissuance or modification

(3) Denial of a permit renewal application

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

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

**SECTION B. General Title V Requirements****#009 [25 Pa. Code § 127.512(c)(2)]****Need to Halt or Reduce Activity Not a Defense**

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

#010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]**Duty to Provide Information**

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]**Reopening and Revising the Title V Permit for Cause**

(a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.

(b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:

(1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.

(2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.

(3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

(4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.

(d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

#012 [25 Pa. Code § 127.543]**Reopening a Title V Permit for Cause by EPA**

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

**SECTION B. General Title V Requirements****#013 [25 Pa. Code § 127.522(a)]****Operating Permit Application Review by the EPA**

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#014 [25 Pa. Code § 127.541]**Significant Operating Permit Modifications**

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#015 [25 Pa. Code §§ 121.1 & 127.462]**Minor Operating Permit Modifications**

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

#016 [25 Pa. Code § 127.450]**Administrative Operating Permit Amendments**

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

#017 [25 Pa. Code § 127.512(b)]**Severability Clause**

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

**SECTION B. General Title V Requirements****#018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]****Fee Payment**

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.
- (1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.
 - (2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.
 - (3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

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

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

- (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

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

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

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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 or 25 Pa. Code Article III.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General Title V Requirements**

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

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

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

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

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

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

#022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]**Submissions**

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

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

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

#023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]**Sampling, Testing and Monitoring Procedures**

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this

**SECTION B. General Title V Requirements**

permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#024 [25 Pa. Code § 127.513]**Compliance Certification**

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

#025 [25 Pa. Code §§ 127.511 & Chapter 135]**Recordkeeping Requirements**

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

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

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

(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

**SECTION B. General Title V Requirements****#026 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]****Reporting Requirements**

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#027 [25 Pa. Code § 127.3]**Operational Flexibility**

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

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

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

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

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

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

**SECTION B. General Title V Requirements**

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
 - (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
- (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.
 - (2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

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

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

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

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

- (1) The applicable requirements are included and are specifically identified in this permit.
- (2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

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

- (1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.
- (2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

**SECTION B. General Title V Requirements**

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

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

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

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

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

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

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

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

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

The permittee shall not permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

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

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

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations, as specified in 25 Pa. Code § 129.14.

(7) N/A

(8) N/A

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

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

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

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

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

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

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

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

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

(a) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour; or

(b) Equal to or greater than 60% at any time.

**SECTION C. Site Level Requirements****# 006 [25 Pa. Code §123.42]****Exceptions**

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

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

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

The permittee shall limit the Hazardous Air Pollutants (HAPs) from the facility to the following.

- (a) Less than 10 tons per year for any individual HAP, calculated on a monthly basis and on a 12-month rolling sum
- (b) Less than 25 tons per year for any combination of HAPs, calculated on a monthly basis and on a 12-month rolling sum.

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

The combined site level NOx emissions from this facility shall not exceed 24.99 tons per year, based on a 12-month rolling sum.

009 [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.
- (e) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of the structure.
- (f) A fire set solely for recreational or ceremonial purposes.
- (g) A fire set solely for cooking food.

II. TESTING REQUIREMENTS.**# 010 [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. Any questions or concerns about source testing submissions can be sent to PSIMS Administrator. Email addresses are provided below.

**SECTION C. Site Level Requirements**

- (1) Southeast Region - RA-EPSEstacktesting@pa.gov
- (2) PSIMS Administrator - RA-EPstacktesting@pa.gov

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

- (1) Test Date(s) and operating permit number.
- (2) For protocols, provide the proposed date on which testing will commence or "TBD".
- (3) For reports, provide the first and last day of testing.
- (4) Facility Identification Number (Facility - ID).
- (5) 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.
- (6) Testing Requirements (all that apply).

(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".

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

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

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

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

(a) The permittee shall perform a source test for VOC's on the HES and AdWest Thermal Oxidizers, using Department-approved procedures for source testing, every five (5) years or once within the life of the permit. 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. Such testing shall be conducted at least 12 months prior to the expiration of this permit. The source test results shall be submitted for review no later than 6 months before the permit expiration.

(b) Source tests shall be conducted while the sources are operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.

(c) The source tests shall test for the VOC destruction efficiency and outlet VOC concentration, in pounds per hour, for both thermal oxidizers (T01 & T05). Tests shall be conducted in accordance with the provisions of EPA Method/s and 25 Pa. Code Chapter 139.

(d) The permittee shall also perform source tests, on all the total enclosures at this facility, in accordance with the provisions of Chapter 139 of the rules and regulations to measure the total enclosure capture efficiency using EPA Method 204.

(e) At least ninety (90) days prior to the test, the company 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.

(f) 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.

(g) Within sixty (60) days after the source test(s), an electronic copy of the complete test report, including all operating conditions, shall be submitted to the Regional Air Quality Manager for approval.

**SECTION C. Site Level Requirements**

(h) 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.

III. MONITORING REQUIREMENTS.**# 013 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

- (a) The permittee shall monitor the facility, once per operating day, for the following.
 - (1) Odors which may be objectionable (as per 25 Pa. Code §123.31).
 - (2) Visible emissions (as per 25 Pa. Code §§123.41 and 123.42).
 - (3) Fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).
- (b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:
 - (1) Be investigated.
 - (2) Be reported to the facility management, or individual(s) designated by the permittee.
 - (3) Have appropriate corrective action taken (for emissions that originate on-site).
 - (4) Be recorded in a permanent written log.
- (c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification (if applicable), complaints, monitoring results, and/or Department findings.

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

The permittee shall calculate and record the following facility aggregate emissions on a monthly basis and on a 12-month rolling sum.

- (a) Individual HAP emissions and the total combined HAP emissions.
- (b) NO_x emissions.
- (c) VOC emissions.

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

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

**SECTION C. Site Level Requirements**

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

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

Recordkeeping and the supporting information required by this Permit shall be maintained for a minimum of five (5) years.

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

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

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

019 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (a) The permittee shall calculate and record the site level NO_x emissions on a monthly basis and a 12-month rolling basis.
- (b) When calculating the site level NO_x emissions, the permittee shall use the latest edition of the EPA's AP-42 emission factors, manufacturer's emission factor if available, or a specific emission factor demonstrated by performance stack testing in accordance with applicable provisions of 25 Pa. Code Chapter 139.
- (c) All records shall be kept for a minimum of five years and be made readily available for the Departments review upon request.

V. REPORTING REQUIREMENTS.**# 020 [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.
 - (6) Corrective actions or preventative measures taken.
- (d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business

**SECTION C. Site Level Requirements**

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.

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

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

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

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

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

- (i) Three years after the date on which a regulated substance is first listed under 40 CFR § 68.130.
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

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

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

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

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

(1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,

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

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

**SECTION C. Site Level Requirements**

(f) When this facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if the permittee fails to submit a compliance schedule or fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

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

[Additional authority for this condition is also derived from 25 Pa. Code § 127.511(c).]

The permittee shall submit the following.

(a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under condition #26 of section B of this permit. The annual certificate of compliance shall be submitted to DEP electronically, and to EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov. The subject line shall read: TVOP No. 09-00027, Fres-co System USA, Inc.

(b) A semi-annual deviation report to DEP, due by October 1 of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the obligation for the second deviation reporting period (July 1 through December 31 of the previous year).

VI. WORK PRACTICE REQUIREMENTS.**# 023 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

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

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

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

(c) Paving and maintenance of roadways.

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

024 [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 #019(g), of Section B, of this permit.

025 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

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

026 [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 Operating 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.

**SECTION C. Site Level Requirements****# 027 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The following work practice standards shall be followed:

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

VII. ADDITIONAL REQUIREMENTS.

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

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

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

**SECTION D. Source Level Requirements**

Source ID: 031

Source Name: SUPERIOR BOILER 502

Source Capacity/Throughput:

14.700

MMBTU/HR

N/A

NATURAL GAS

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The emissions from the boiler shall not exceed the limits listed below.

(a) 30 ppm_{dv} NO_x at 3% O₂ when firing gas.(b) 400 ppm_{dv} CO at 3% O₂.**Fuel Restriction(s).**

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall only fire natural gas in this boiler.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of natural gas consumed on a monthly basis and a 12-month rolling sum.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record the amount of natural gas consumed on a monthly basis and 12-month rolling sum.

[Compliance with this condition assures compliance with 40 CFR § 60.48c(g)]

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor and record the following emissions from the boiler on a monthly basis and a 12-month rolling sum.

(a) NO_x

(b) VOC

(c) CO

**SECTION D. Source Level Requirements****V. REPORTING REQUIREMENTS.**

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

VI. WORK PRACTICE REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

VII. ADDITIONAL REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) This boiler does not have a low NOx burner or a flue gas recirculation unit.

(b) An oxygen trim system was installed on this boiler under RFD 09-A01-1195 approved by the Department in February 2009.

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

**SECTION D. Source Level Requirements**

Source ID: 032

Source Name: YORK SHIPLEY BOILER 501

Source Capacity/Throughput:

8.400 MMBTU/HR

N/A

Natural Gas

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall only fire natural gas in this boiler.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of natural gas consumed on a monthly basis and a 12-month rolling sum.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record the amount of natural gas consumed on a monthly basis and 12-month rolling sum.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor and record the following emissions from the boiler on a monthly basis and a 12-month rolling sum.

- (a) NOx
- (b) VOC
- (c) CO

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This boiler does not have a low NOx burner or a flue gas recirculation unit.

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

**SECTION D. Source Level Requirements**

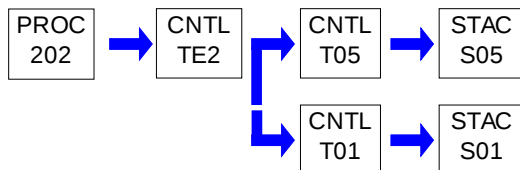
Source ID: 202

Source Name: ROTOGRAVURE PRESS (8 STATIONS)

Source Capacity/Throughput:

N/A

INK SOLVENTS

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

The VOC emissions and press cleanup solvent emissions for this source, shall not exceed 36.1 pounds per hour (averaged daily), 564 pounds per day and 32 tons per year on a 12-month rolling sum.

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

The total VOC emissions from the clean-up operations for this source, shall not exceed 3 pounds per hour (averaged daily), 15 pounds per day and 2.7 tons per year on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor the following information.

- (a) Composition and amount of coatings, as applied per job.
- (b) Composition and amount of cleaning solvents and diluents used on a daily basis.
- (c) Air flows being ducted to the control equipment on a daily basis.

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

The air passing through all natural draft openings of total enclosures shall flow into the enclosure continuously. The continuous inward flow of air shall be verified by continuous observation of streamers, or other means approved by the Department, maintained at the natural draft openings.

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

The permittee shall record the following information.

- (a) Composition and amount of coatings, as applied per job.
- (b) Composition and amount of cleaning solvents and diluents used on a daily basis.
- (c) Air flows being ducted to the control equipment on a daily basis.

**SECTION D. Source Level Requirements****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall calculate and record the VOC emissions on a monthly basis and on a 12-month rolling sum.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.829]**Subpart KK--National Emission Standards for the Printing and Publishing Industry****Recordkeeping requirements.**

The owner or operator of each facility shall maintain records of all required measurements and calculations needed to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.830]**Subpart KK--National Emission Standards for the Printing and Publishing Industry****Reporting requirements.**

The permittee shall submit the reports specified in paragraphs below to the Administrator.

(a) Initial notifications for new and reconstructed sources shall be submitted as required by 40 CFR §63.9(b).

(b) A Title V or part 70 permit application may be used in lieu of the initial notification required under 40 CFR §63.9(b), provided the same information is contained in the permit application as required by 40 CFR §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

V. REPORTING REQUIREMENTS.

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

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

(a) The permittee shall operate and maintain a 100 % VOC emission capture total enclosure system for this press.

(b) The enclosure shall comply with the techniques and constraints outlined in the New Source Performance Standards Subpart SSS, 40 CFR Section 60.712(b)(5)(i).

(c) The total enclosure for this source shall be vented to either the HES or AdWest thermal oxidizers.

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

While the press is operating, the permittee shall always operate and maintain a permanent total enclosure around this press.

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

Source 202 is an eight station rotogravure press.

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

**SECTION D. Source Level Requirements**

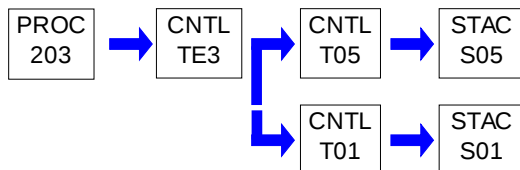
Source ID: 203

Source Name: ROTOGRAVURE PRESS (11 STATIONS)

Source Capacity/Throughput:

N/A

INK SOLVENTS

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

The VOC emissions and the press cleanup solvent emissions from this source shall not exceed 50 pounds per hour (averaged daily), 600 pounds per day and 30 tons per year on a 12-month rolling sum.

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

The total VOC emissions from the clean-up operations for this source, shall not exceed 3 pounds per hour (averaged daily), 15 pounds per day and 2.7 tons per year on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor the following information.

- (a) Composition and amount of coatings, as applied per job.
- (b) Composition and amount of cleaning solvents and diluents used on a daily basis.
- (c) Air flows being ducted to the control equipment on a daily basis.

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

The air passing through all natural draft openings of total enclosures shall flow into the enclosure continuously. The continuous inward flow of air shall be verified by continuous observation of streamers, or other means approved by the Department, maintained at the natural draft openings.

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

The permittee shall record the following information.

- (a) Composition and amount of coatings, as applied per job.
- (b) Composition and amount of cleaning solvents and diluents used on a daily basis.
- (c) Air flows being ducted to the control equipment on a daily basis.

**SECTION D. Source Level Requirements****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall calculate and record the VOC emissions on a monthly basis and on a 12-month rolling sum.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.829]**Subpart KK--National Emission Standards for the Printing and Publishing Industry****Recordkeeping requirements.**

The owner or operator of each facility shall maintain records of all required measurements and calculations needed to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.830]**Subpart KK--National Emission Standards for the Printing and Publishing Industry****Reporting requirements.**

The permittee shall submit the reports specified in paragraphs below to the Administrator.

(a) Initial notifications for new and reconstructed sources shall be submitted as required by 40 CFR §63.9(b).

(b) A Title V or part 70 permit application may be used in lieu of the initial notification required under 40 CFR §63.9(b), provided the same information is contained in the permit application as required by 40 CFR §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

V. REPORTING REQUIREMENTS.

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

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

(a) The permittee shall operate and maintain a 100% VOC emission capture total enclosure system for this press.

(b) The enclosure shall comply with the techniques and constraints outlined in the New Source Performance Standards Subpart SSS, 40 CFR Section 60.712(b)(5)(i).

(c) The total enclosure for this source shall be vented to either the HES or AdWest thermal oxidizers.

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

While the press is operating, the permittee shall always operate and maintain a permanent total enclosure around this press.

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

Source 203 is a eleven station rotogravure press.

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

**SECTION D. Source Level Requirements**

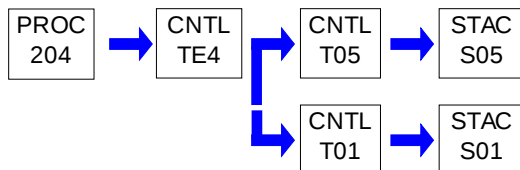
Source ID: 204

Source Name: FLEXOGRAPHIC PRESS (8 STATIONS) & 3 LAMINATORS

Source Capacity/Throughput:

N/A

INK SOLVENTS

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

(a) The VOC emissions from this press shall not exceed 17.15 pounds per hour (averaged daily).

(b) The total VOC emissions from the oxidizer, the clean-up solvents and combustion from the printing press dryer shall not exceed 39.55 tons per year on a 12-month rolling sum.

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

The total VOC emissions from the clean-up operations for this source, shall not exceed 3 pounds per hour (averaged daily), 15 pounds per day and 2.7 tons per year on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor the following information.

(a) Composition and amount of coatings, as applied per job.

(b) Composition and amount of cleaning solvents and diluents used on a daily basis.

(c) Air flows being ducted to the control equipment on a daily basis.

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

The air passing through all natural draft openings of total enclosures shall flow into the enclosure continuously. The continuous inward flow of air shall be verified by continuous observation of streamers, or other means approved by the Department, maintained at the natural draft openings.

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

The permittee shall record the following information.

(a) Composition and amount of coatings, as applied per job.

(b) Composition and amount of cleaning solvents and diluents used on a daily basis.

(c) Air flows being ducted to the control equipment on a daily basis.

**SECTION D. Source Level Requirements****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall calculate and record the VOC emissions on a monthly basis and on a 12-month rolling sum.

007 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.829]**Subpart KK--National Emission Standards for the Printing and Publishing Industry****Recordkeeping requirements.**

The owner or operator of each facility shall maintain records of all required measurements and calculations needed to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.830]**Subpart KK--National Emission Standards for the Printing and Publishing Industry****Reporting requirements.**

The permittee shall submit the reports specified in paragraphs below to the Administrator.

(a) Initial notifications for new and reconstructed sources shall be submitted as required by 40 CFR §63.9(b).

(b) A Title V or part 70 permit application may be used in lieu of the initial notification required under 40 CFR §63.9(b), provided the same information is contained in the permit application as required by 40 CFR §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

V. REPORTING REQUIREMENTS.

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

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

(a) The permittee shall operate and maintain a 100% VOC emission capture total enclosure system for this press.

(b) The total enclosure for this source shall be vented to either the HES or AdWest thermal oxidizers.

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

While the press is operating, the permittee shall always operate and maintain a permanent total enclosure around this press.

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

Source 204 has eight printing stations and three laminating stations (including one solventless).

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

**SECTION D. Source Level Requirements**

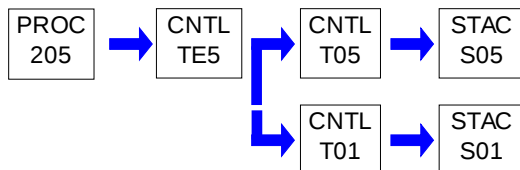
Source ID: 205

Source Name: ROTOGRAVURE PRESS & SOLVENT DISTILLATION SYSTEM

Source Capacity/Throughput:

N/A

INK USAGE

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the total VOC emissions from this source to less than 7.2 lb/hr averaged daily, and 17.58 tpy calculated on a 12-month rolling sum.

Operation Hours Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the hours of operation for this press to less than 7884 hours per year for production purposes calculated on a 12-month rolling sum. The hour per year limit does not include hours for down time, cleaning or changeovers.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The air passing through all natural draft openings of total enclosures shall flow into the enclosure continuously. The continuous inward flow of air shall be verified by continuous observation of streamers, or other means approved by the Department, maintained at the natural draft openings.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following for this source.

- (a) Composition and amount of coatings, as applied per job.
- (b) Composition and amount of cleaning solvents and diluents used on a daily basis.
- (c) The air flow that is being ducted to the oxidizers on a daily basis.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate and record the VOC lb/hr emissions from this source, averaged daily and tons per year emissions calculated monthly and on a 12-month rolling sum.

**SECTION D. Source Level Requirements****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall calculate and record the following for this source.

- (a) Composition and amount of coatings, as applied per job.
- (b) Composition and amount of cleaning solvents and diluents used on a daily basis.
- (c) The air flow that is being ducted to the oxidizers on a daily basis.
- (d) Safety Data Sheet for each ink used.

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

The permittee shall calculate and record the NO_x and VOC emissions (in tons) from the oil heater associated with this source monthly and on a 12-month rolling sum.

008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.829]**Subpart KK--National Emission Standards for the Printing and Publishing Industry
Recordkeeping requirements.**

The owner or operator of each facility shall maintain records of all required measurements and calculations needed to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

V. REPORTING REQUIREMENTS.**# 009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.830]****Subpart KK--National Emission Standards for the Printing and Publishing Industry
Reporting requirements.**

The permittee shall submit the reports specified in paragraphs below to the Administrator.

- (a) Initial notifications for new and reconstructed sources shall be submitted as required by 40 CFR §63.9(b).
- (b) A Title V or part 70 permit application may be used in lieu of the initial notification required under 40 CFR §63.9(b), provided the same information is contained in the permit application as required by 40 CFR §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

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

The permittee shall operate and maintain the solvent distillation system according to the manufacturer's specifications.

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

While the press is operating, the permittee shall always operate and maintain a permanent total enclosure around this press.

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

- (a) The permittee shall operate and maintain a 100% VOC emission capture total enclosure system for this press.
- (b) The total enclosure for this source shall be vented to either the HES or AdWest thermal oxidizers.

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

This source consists of the following.

**SECTION D. Source Level Requirements**

(a) Rotogravure Press, Manufactured by Cerruti, Model No. R-970/3, 10 stations.

(b) Solvent Distillation System, Manufactured by Progressive Recovery, Inc, Model No. SCR-350E with 2 storage vessels (1,000 gallon dirty solvent tank and 1,000 gallon clean solvent tank).

(c) Oil heater, Manufactured by Heatec, Model No. HCL-6010-40-D, maximum rated heat input 9.4 MMBTU/HR, burns natural gas and/or No. 2 fuel oil, with a Low NOx burner.

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

**SECTION D. Source Level Requirements**

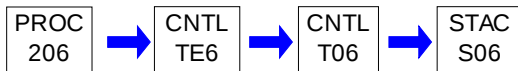
Source ID: 206

Source Name: BOBST LAMINATOR (3 STATIONS)

Source Capacity/Throughput:

N/A

INK

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

The permittee may not permit the emission of particulate matter into the outdoor atmosphere from this source in excess of 0.04 gr/dscf, pursuant to 25 Pa. Code § 123.13 (c)(1)(i).

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

VOC emission from Source 206 shall not exceed 19.20 tons per year.

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

VOC emissions at the outlet of the RTOs shall meet a minimum destruction efficiency of 98.00%, or a post control non-methane hydrocarbon (NMHC) emission of 20.00 ppmvd or less as methane whichever is less stringent.

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

(a) The three laminator adhesive stations that make up Source ID: 206 shall each have a total enclosure.

(b) The emissions from each total enclosure shall be vented to Control TO6.

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

(a) The permittee shall perform a stack test using the Department-approved procedures, to show compliance with the emission limits set for the source. The Source testing shall be performed within 180 days after startup of the source, and the stack test shall be performed while all three laminators are in operation. Source testing shall be performed for the following pollutants: VOC, NOx and CO. 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.

(b) 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.

(c) 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.

(d) Testing shall be conducted at the combustion chamber inlet and outlet of the Regenerative Thermal Oxidizer (RTO) to demonstrate compliance with the 98.00% VOC destruction efficiency, or a post control non-methane hydrocarbon (NMHC) emission of 20.00 ppmvd or less as methane, whichever is less stringent. The VOC test results are to be expressed as methane. Also, the permittee shall conduct a source test to determine the emission rates of: VOC, NOx and CO at the outlet of the RTO in pounds per hour.

**SECTION D. Source Level Requirements**

(e) The following process data shall be recorded during each test run to document the operation of the laminator:

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

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

(g) At the same time as the above source test the permittee shall also perform a source test in accordance with the provisions of Chapter 139 of the rules and regulations to measure the total enclosure capture efficiency using EPA Method 204.

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

(i) 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.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall submit one paper copy plus one electronic copy of 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 (mail and 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.

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

(1) Test Date(s).

(i) For protocols, provide the proposed date on which testing will commence or "TBD".

(ii) 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).

(i) Plan approval number(s).

(ii) Operating permit number.

(iii) Applicable federal subpart(s) (i.e. 40 C.F.R. 60, Subpart JJJJ).

(iv) Special purpose(s) (Consent Order, RFD, RACT II, Tier II, etc.).

(c) Mail all paper submissions to both the PSIMS Administrator and the Air Quality Program Manager for the Southeast Regional Office. Mailing addresses are provided below.

Central Office
Pennsylvania Department of Environmental Protection
Attn: PSIMS Administrator
P.O. Box 8468
Harrisburg, PA 17105-8468

**SECTION D. Source Level Requirements**

Southeast Region
Pennsylvania Department of Environmental Protection
Attn: Air Quality Program Manager
2 East Main Street
Norristown, PA 19401

(d) Eliminate shading, color ink for data emphasis, small font size, and color saturation as the scanning to create an electronic file is done in black and white. Shading and color emphasis do not scan well and make the electronic copies difficult to read.

(e) Email all electronic submissions to both the PSIMS Administrator in Central Office and the Air Quality Program Manager for the Southeast Regional Office. Email addresses are provided below.

Central Office
RA-EPstacktesting@pa.gov

Southeast Region
RA-EPSEstacktesting@pa.gov

(f) The Department limits emails to 15 MB and PSIMS has a file size limitation of 100 MB for electronic files. Submit just one electronic file (convert any Microsoft Word or Excel files to an Adobe PDF format and combine them with the report or protocol), unless the submission contains CONFIDENTIAL information.

(g) 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".

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

The air passing through all natural draft openings of discrete enclosures shall flow into the enclosure continuously. The continuous inward flow of air shall be verified by continuous observation of streamers, or other means approved by the Department, maintained at the natural draft openings.

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

The permittee shall monitor the following.

- (1) The monthly adhesives, coatings, inks solvents, and clean-up solvents consumed in pounds or gallons.
- (2) The facility aggregate VOC emissions on a monthly and 12-month rolling sum basis.

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

(a) The permittee shall keep and maintain the following records:

- (1) The percent by weight VOC content for adhesives, coatings, inks, solvents, and clean-up solvents used in pounds or gallons on a monthly basis.
- (2) The facility aggregate VOC emissions on a monthly and 12-month rolling sum basis.

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

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

**SECTION D. Source Level Requirements**

(b) All records shall be kept for at least 5 years and shall be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall comply with the following work practices throughout the facility:

- (1) Store all VOC-containing solutions, VOC-containing waste solutions and used shop towels in closed containers.
- (2) Ensure that mixing vessels and storage containers used for VOC-containing solutions, VOC-containing waste solutions and used shop towels are kept closed at all times, except when depositing or removing these solutions or shop towels.
- (3) Minimize spills of VOC-containing solutions and VOC-containing waste solutions and clean up spills immediately.
- (4) Convey VOC-containing solutions, VOC-containing waste solutions and used shop towels from one location to another in closed containers or pipes.

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: 302

Source Name: WASHROOM

Source Capacity/Throughput:

N/A

SOLVENT

PROC
302STAC
Z201**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §129.112]

Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule

The total VOC emissions from this source shall be less than 2.70 tons per year calculated on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate and record the following on a monthly basis for this source.

- (a) The solvent throughput used (lbs/hr).
- (b) The chemical composition of VOCs used in the Washroom through a Safety Data Sheet for each ink used.
- (c) The VOC emissions on a monthly basis and a 12-month rolling sum.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of the percent VOC by weight in each solvent and the vapor pressure at 20 degrees Celsius for each solvent.

004 [25 Pa. Code §129.63]

Degreasing operations

The permittee shall keep records of the following for all solvents used in this source.

- (a) An invoice.
- (b) A bill of sale.
- (c) Certificate that corresponds to a number of sales.
- (d) Safety Data Sheet (SDS), or
- (e) Other appropriate documentation acceptable to the Department may be used to comply with 25 Pa. Code 129.63.

**SECTION D. Source Level Requirements****V. REPORTING REQUIREMENTS.**

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

VI. WORK PRACTICE REQUIREMENTS.**# 005 [25 Pa. Code §129.112]****Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule**

The permittee shall install, maintain and operate this source in accordance with the manufacturer's specifications and with good operating practice.

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

Cold cleaning machines shall be operated in accordance with the following procedures.

- (a) 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.
- (b) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (c) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
- (d) Air agitated solvent baths may not be used.
- (e) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

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

- (a) After December 22, 2002, a person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.
- (b) On and after December 22, 2002, a person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information.
 - (1) The name and address of the solvent supplier.
 - (2) The type of solvent including the product or vendor identification number.
 - (3) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).
- (c) Paragraph (a) does not apply to the following.
 - (1) Cold cleaning machines used in extreme cleaning service.
 - (2) If the permittee demonstrates, and the Department approves in writing, that compliance with paragraph (a) will result in unsafe operating conditions.
 - (3) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

008 [25 Pa. Code §129.63]**Degreasing operations**

- (a) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.
- (b) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall adhere to the following.
 - (1) Have a permanent, conspicuous label summarizing the operating requirements in 25 Pa. Code 129.63(a)(3). In addition, the label shall include the following discretionary good operating practices.

**SECTION D. Source Level Requirements**

- (i) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.
- (2) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.
- (3) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.
- (4) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.

VII. ADDITIONAL REQUIREMENTS.

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

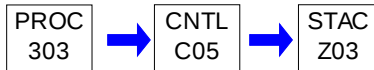
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 303

Source Name: ROLLER RESURFACING

Source Capacity/Throughput:

**I. RESTRICTIONS.****Operation Hours Restriction(s).**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the hours of operation for this source to less than 2,000 hours per year, calculated on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following for this source.

- (a) The hours of operation, for the cyclone/baghouse, on a monthly basis and on a 12-month rolling sum.
- (b) The calculations of the PM emissions on a monthly basis and on a 12-month rolling sum.
- (c) The monthly inspections of the filters.
- (d) The repairs and maintenances conducted on the cyclone/baghouse.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record the following for this source.

- (a) The hours of operation, for the cyclone/baghouse, on a monthly basis and on a 12-month rolling sum.
- (b) The calculations of the PM emissions on a monthly basis and on a 12-month rolling sum.
- (c) The monthly inspections of the filters.
- (d) The repairs and maintenances conducted on the cyclone/baghouse.

V. REPORTING REQUIREMENTS.

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

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

- (a) Do not operate the lathe unless the emissions are controlled by the cyclone and baghouse.
- (b) Operate and maintain, on the lathe, an automatic shut-down-start up system, to prevent the lathe from operating when the cyclone and baghouse are not operating or malfunctioning.

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

- (a) Operate and maintain the cyclone/baghouse in accordance with the manufacturer's specifications and good air pollution control practices.
- (b) Inspect the filters in the cyclone/baghouse monthly for gaps and/or holes and clean and/or replace according to the manufacturer's recommended procedure, or as needed.
- (c) Keep spare filters on hand replacement.

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

This source consists of the following.

- (a) A rubber roller resurfacing lathe with rated capacity of four rollers per hour, manufactured by Clausen-Metaso, Model No. C2087, or equivalent as approved by the Department.
- (b) A Cyclone, manufactured by Murphy-Rodgers, with 90 percent removal efficiency, or equivalent as approved by the Department.
- (c) A Baghouse, with four felted fabric filter bags, with 98 percent removal efficiency, manufactured by MRC, Model 10C-10D, or equivalent as approved by the Department.

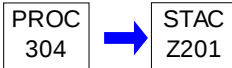
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 304

Source Name: MAINTENANCE ROOM PARTS WASHER

Source Capacity/Throughput:

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.**# 001 [25 Pa. Code §129.63]****Degreasing operations**

The permittee shall keep records of the following for all solvents used in this source.

- (a) An invoice for purchase of solvent and documentation that corresponds to the number of purchase.
- (b) A Safety Data Sheet.
- (c) The VOC emissions on a monthly basis and a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 002 [25 Pa. Code §129.63]****Degreasing operations**

Cold cleaning machines shall be operated in accordance with the following procedures.

- (a) 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.
- (b) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (c) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
- (d) Air agitated solvent baths may not be used.
- (e) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

**SECTION D. Source Level Requirements****# 003 [25 Pa. Code §129.63]****Degreasing operations**

(a) After December 22, 2002, a person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury or greater and containing greater than 5% VOC by weight, measured at 68°F containing VOCs.

(b) On and after December 22, 2002, a person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information.

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

(c) Paragraph (a) does not apply to the following.

- (1) If the permittee demonstrates, and the Department approves in writing, that compliance with paragraph (a) will result in unsafe operating conditions.
- (2) Immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

004 [25 Pa. Code §129.63]**Degreasing operations**

(a) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.

(b) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall have the following.

(1) A permanent, conspicuous label summarizing the operating requirements. In addition, the label shall include the following discretionary good operating practices.

(i) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.

(ii) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.

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

(2) A cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.

VII. ADDITIONAL REQUIREMENTS.

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

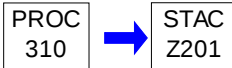
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 310

Source Name: INK MIXING

Source Capacity/Throughput:

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

001 [25 Pa. Code §129.112]

Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule

The total VOC emissions from this source shall be less than 2.70 tons per year calculated on a 12-month rolling sum.

Throughput Restriction(s).

002 [25 Pa. Code §129.112]

Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule

(a) The amount of ink processed in this source shall not exceed 1,434,000 pounds (168,706 gallons) per year calculated on a 12-month rolling sum.

(b) The ink processed in this source shall not exceed a VOC weight percent of 75.00 percent.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the amount of inks processed through this source, in pounds, on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall calculate and record the amount of inks processed, in pounds, on a monthly basis and as a 12-month rolling sum.

(b) When calculating the VOC emissions the following formula shall be used.

(1) (Pounds of ink)(0.75)(0.005) = VOCs.

(2) 0.75 is the highest VOC percent by weight ink processed and 0.005 is the emission factor.

V. REPORTING REQUIREMENTS.

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

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.**

005 [25 Pa. Code §129.112]

Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule

The permittee shall install, maintain and operate this source in accordance with the manufacturer's specifications and with good operating practice.

VII. ADDITIONAL REQUIREMENTS.

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

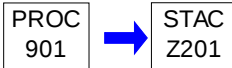
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 901

Source Name: MISCELLANEOUS RACT OP SOURCES

Source Capacity/Throughput:

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

001 [25 Pa. Code §129.112]

Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule

The total VOC emissions from each source listed in Condition # 004 of this source shall be less than 2.70 tons per year calculated on a 12-month rolling sum.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall calculate and record the VOC emissions from each source listed in Condition # 004 of this source on a monthly basis and a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §129.112]

Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule

The permittee shall install, maintain and operate this source in accordance with the manufacturer's specifications and with good operating practice.

VII. ADDITIONAL REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Source 901 - consists of the following.

- (a) Cylinder Prep/Cleanup
- (b) Solvent Reclaim Operations
- (c) Solvent Dispensing Operations
- (d) Extrusion Operations and Film Extruder
- (e) QA/QC

**SECTION D. Source Level Requirements**

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

**SECTION D. Source Level Requirements**

Source ID: 904

Source Name: 80KW EMERGENCY GENERATOR ENGINE

Source Capacity/Throughput:

0.280 MMBTU/HR

2.000 Gal/HR

Diesel Fuel

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the NO_x emissions from this source to less than 100 lbs/hr averaged monthly, 1000 lbs/day averaged monthly, 2.75 tons per ozone season (May 1st through September 30th of each year) and 6.6 tons per year calculated on a 12-month rolling sum.

Fuel Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall only use diesel fuel for this source that complies with the following per-gallon standards

(1) A minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

(2) A maximum sulfur Content of 15 ppm.

Operation Hours Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall limit the annual operating hours for readiness testing and maintenance to less than 100 hours per year, calculated on a 12-month rolling sum.

(b) This source shall not be used for peak shaving or to generate income for the facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity.

[Compliance with this condition assures compliance with 40 CFR Part 60 § 60.4211(f)]

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall monitor the following.

(a) The date the oil was changed and the date the oil filter was replaced along with the hour reading on the non-resettable hour meter when the oil was changed and oil filter replaced.

(b) The date the air cleaner was inspected and the hour reading on the non-resettable hour meter when the inspection

**SECTION D. Source Level Requirements**

occurred.

(c) The date the hoses and belts were inspected and the hour reading on the non-resettable hour meter when the inspection occurred. The permittee shall also record if any belts or hoses were replaced.

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

The permittee shall calculate and record the NO_x emissions for this source in lbs/hr averaged monthly, lbs/day averaged monthly, tons per ozone season (May 1st through September 30th) and tons per year on a monthly basis and 12-month rolling sum.

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

The permittee shall keep records of the following.

(a) The date the oil was changed and the date the oil filter was replaced along with the hour reading on the non-resettable hour meter when the oil was changed and oil filter replaced.

(b) The date the air cleaner was inspected and the hour reading on the non-resettable hour meter when the inspection occurred.

(c) The date the hoses and belts were inspected and the hour reading on the non-resettable hour meter when the inspection occurred. The permittee shall also record if any belts or hoses were replaced.

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

The permittee shall keep records of the hours of operation for this generator monthly and on a 12-month rolling sum.

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

The permittee shall obtain and keep a copy of a dated statement, upon each delivery, from the fuel supplier that states that the diesel fuel complies with the specifications below.

(1) A minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

(2) A maximum sulfur Content of 15 ppm.

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

The permittee shall keep records of the annual operating hours for readiness testing and maintenance on a monthly and on a 12-month rolling sum.

V. REPORTING REQUIREMENTS.

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

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

[Additional authority for this permit condition is also derived from 40 CFR Part 60 § 60.4211(a)]

The permittee shall install, operate and maintain this source according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer, over the entire life of the engine. In addition, the permittee may only change those settings that are permitted by the manufacturer.

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

The permittee shall maintain a non-resettable hour meter on this engine at all times.

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

(a) The permittee shall change the oil and oil filter every 500 hours of operation or annually, whichever comes first.

(b) The permittee shall inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and

(c) The permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[Compliance with this condition assures compliance with 40 CFR Subpart ZZZZ of Part 63 Table 2d]

VII. ADDITIONAL REQUIREMENTS.

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

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

**SECTION D. Source Level Requirements**

Source ID: T01

Source Name: HES THERMAL OXIDIZER

Source Capacity/Throughput:	94.000 Gal/HR	#2 Oil
	12.700 MCF/HR	Natural Gas

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The combined air flow to the HES oxidizer shall not exceed 70,000 scfm, expressed as an hourly average.

Control Device Efficiency Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The HES oxidizer shall have a minimum VOC destruction efficiency of 98.0% or a VOC concentration less than 20 ppm as methane.

(b) The HES oxidizer shall operate so as to maintain the exhaust at a minimum combustion exit gas temperature of 1,450° F and a residence time of one second.

(c) Fres-co shall increase the operating temperature of T01 to a temperature necessary to maintain a VOC destruction efficiency of 98.0 %. Compliance with this requirement will be determined by stack test as approved by the Department.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.3 and § 64.6]

The permittee shall continuously monitor the combustion chamber temperature and inlet airflows of this oxidizer. The temperature monitoring shall be performed using a Department approved method.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.9.]

The permittee shall keep records of the following.

(a) The temperature for the outlet of the combustion chamber.

(b) The airflow to the thermal oxidizer expressed as an hourly average, daily.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.9.]

The permittee shall record all excursions, as defined in 40 CFR § 64.1, and corrective actions taken in response to an excursion and the time elapsed until the corrective actions have been taken.

**SECTION D. Source Level Requirements****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 40 CFR § 64.9.]

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

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

[Additional authority for this permit condition is also derived from 40 CFR § 64.9.]

The permittee shall record all inspections, repairs, calibrations and preventative maintenance performed on the following.

- (a) Oxidizer
- (b) Thermocouples
- (c) Air flow meters

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

The permittee shall record the date that a determination was made to implement a QIP plan.

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

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

The permittee shall record actions taken to implement a QIP during a reporting period and all related actions including, but not limited to inspections, repairs, and maintenance performed on the monitoring equipment.

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

[Additional authority for this permit condition is also derived from 40 CFR § 64.9 & § 70.6(a)(3)(iii)(A)]

- (a) The permittee shall report all excursions and corrective actions taken, the dates, times, durations and probable causes, every six months to the Department.
- (b) The report shall be included in the annual compliance report or semi-annual deviation report, pursuant to Section B of the permittee's current Title V Operating Permit (09-00027).
- (c) The report shall include all monitoring downtime incidents (other than downtime associated with zero span or other daily calibration checks, if applicable), their dates, times and durations, probable causes and corrective actions taken, every six months.

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

- (a) The control equipment shall be operated at a minimum of one hour before inks or coatings are placed in the presses and thirty minutes after the inks and coatings are removed from the presses after the final run and after the presses have been cleaned. The Department may amend this if Fres-co receives Department approval of non VOC inks, coatings and cleaning solutions.
- (b) Fres-co shall not bypass the control equipment when using solvent containing inks and clean up solvents. Fres-co may bypass the control equipment when using only Department approved water based solvents, inks and coatings.

**SECTION D. Source Level Requirements****# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 40 CFR § 64.3 and § 64.6.]

The permittee shall ensure that the following are calibrated at least once annually.

- (a) Thermal oxidizer thermocouples.
- (b) Flow meters.

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

[Additional authority for this permit condition is also derived from 40 CFR § 64.3 and § 64.6.]

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

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

The airflow from the presses shall be ducted to either the HES or AdWest thermal oxidizers, or both, at all times that the press(es) is/are in operation.

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

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

If a QIP plan is requested, the permittee shall develop and implement the QIP as soon as possible. The permittee shall provide a copy of the QIP to the Department. Furthermore, the permittee shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

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

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

The permittee shall develop and implement a QIP if any of the following occur:

- (a) For properly and accurately collected data, accumulated excursions exceed 2% of the data for VOC.
- (b) Six excursions occur in a six month reporting period.
- (c) The Department determines after review of all reported information that the permittee has not sufficiently responded to an excursion.

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

According to 40 CFR § 64.1, exceedance and excursion are defined as follows.

- (a) Exceedance shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.
- (b) Excursion shall mean a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.

**SECTION D. Source Level Requirements**

(c) An exceedance for this Source shall be any time the temperature of the combustion chamber of the oxidizer operates below 1450° F when any source controlled by this oxidizer is using VOC containing inks, coatings or clean-up solvents.

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

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

Implementation of a QIP, shall not excuse the permittee from compliance with any existing emission limitation or standard or any existing monitoring, testing, reporting or recordkeeping requirements that may apply under any federal, state, or local laws or any other applicable requirements under the Clean Air Act.

019 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

In accordance with 40 CFR § 64.8, the QIP shall include procedures for evaluating the control performance problems. Based on the results of the evaluation procedures, the permittee shall modify the QIP and provide the Department with a copy, to include procedures for conducting more frequent, or improved, monitoring in conjunction with one or more of the following.

- (a) Improved preventive maintenance practices
- (b) Process operation changes
- (c) Appropriate improvements to the control methods
- (d) Other steps appropriate to correct performance

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

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

Following implementation of a QIP, the Department will require modifications to the QIP if the plan has failed to either.

- (a) Address the cause of the control device performance problem.
- (b) Provide sufficient procedures for correcting control device performance problems in as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

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

**SECTION D. Source Level Requirements**

Source ID: T05

Source Name: ADWEST THERMAL OXIDIZER

Source Capacity/Throughput:	123.000 Gal/HR	#2 Oil
	16.600 MCF/HR	Natural Gas

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The combined air flow to the Ad West oxidizer shall not exceed 75,000 scfm, expressed as an hourly average.

Control Device Efficiency Restriction(s).

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The Ad West oxidizer shall have a minimum VOC destruction efficiency of 98.0% or a VOC concentration less than 20 ppm as methane.

(b) The hourly averaged operating temperature of the combustion chamber of the oxidizer shall not be less than 1575° F, when operating.

(c) The operating temperature of the combustion chamber of the oxidizer shall not be less than 1500° F, at any time when operating.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.3 and § 64.6]

The permittee shall continuously monitor the combustion chamber temperature and inlet airflows of this oxidizer.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.9.]

The permittee shall keep records of the following.

(a) The temperature for the outlet of the combustion chamber.

(b) The airflow to the thermal oxidizer expressed as an hourly average, daily.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.9.]

The permittee shall record all excursions, as defined in 40 CFR § 64.1, and corrective actions taken in response to an excursion and the time elapsed until the corrective actions have been taken.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.9.]

**SECTION D. Source Level Requirements**

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

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of the natural gas usage on a monthly basis and on a 12-month rolling sum.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.9.]

The permittee shall record all inspections, repairs, calibrations and preventative maintenance performed on.

- (a) Oxidizer
- (b) Thermocouples
- (c) Air flow meters

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall record the date that a determination was made to implement a QIP plan.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

The permittee shall record actions taken to implement a QIP during a reporting period and all related actions including, but not limited to inspections, repairs, and maintenance performed on the monitoring equipment.

V. REPORTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.9 & § 70.6(a)(3)(iii)(A)]

(a) The permittee shall report all excursions and corrective actions taken, the dates, times, durations and probable causes, every six months to the Department.

(b) The report shall be included in the annual compliance report or semi-annual deviation report, pursuant to Section B, of the permittee's current Title V Operating Permit (09-00027).

(c) The report shall include all monitoring downtime incidents (other than downtime associated with zero span or other daily calibration checks, if applicable), their dates, times and durations, probable causes and corrective actions taken, every six months.

VI. WORK PRACTICE REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.3 and § 64.6.]

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

**SECTION D. Source Level Requirements****# 014 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 40 CFR § 64.3 and § 64.6.]

The permittee shall ensure that the following be calibrated at least once annually.

- (a) Thermal oxidizer thermocouples
- (b) Flow meters

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

The airflow from the presses shall be ducted to either the HES or AdWest thermal oxidizers, or both, at all times that the press(es) is/are in operation.

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

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

If a QIP plan is requested, the permittee shall develop and implement the QIP as soon as possible. The permittee shall provide a copy of the QIP to the Department. Furthermore, the permittee shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

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

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

The permittee shall develop and implement a QIP if any of the following occur.

- (a) For properly and accurately collected data, accumulated excursions exceed 2% of the data for VOC.
- (b) Six excursions occur in a six month reporting period.
- (c) The Department determines after review of all reported information that the permittee has not sufficiently responded to an excursion.

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

According to 40 CFR § 64.1, exceedance and excursion are defined as follows.

- (a) Exceedance shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring. Excursion shall mean a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.
- (b) For this Source ID T05, an exceedance shall be, any time the temperature of the combustion chamber of the oxidizer operates below 1450° F when using VOC containing inks, coatings or clean-up solvents.
- (c) For this Source ID T05, an excursion shall be, any time the temperature of the combustion chamber of the oxidizer operates between 1450° - 1500° F when using VOC containing inks, coatings or clean-up solvents.

019 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

**SECTION D. Source Level Requirements**

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

Implementation of a QIP, shall not excuse the permittee from compliance with any existing emission limitation or standard or any existing monitoring, testing, reporting or recordkeeping requirements that may apply under any federal, state, or local laws or any other applicable requirements under the Clean Air Act.

020 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

In accordance with 40 CFR § 64.8, the QIP shall include procedures for evaluating the control performance problems. Based on the results of the evaluation procedures, the permittee shall modify the QIP and provide the Department with a copy, to include procedures for conducting more frequent, or improved, monitoring in conjunction with one or more of the following.

- (a) Improved preventive maintenance practices
- (b) Process operation changes
- (c) Appropriate improvements to the control methods
- (d) Other steps appropriate to correct performance.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 40 CFR § 64.8]

Following implementation of a QIP, the Department will require modifications to the QIP if the plan has failed to either.

- (a) Address the cause of the control device performance problem.
- (b) Provide sufficient procedures for correcting control device performance problems in as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

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

**SECTION D. Source Level Requirements**

Source ID: T06

Source Name: S & S THERMAL OXIDIZER

Source Capacity/Throughput: 56,000.000 MCF/HR Natural Gas

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

(a) The Regenerative Thermal Oxidizer (RTO) shall be operated as the only control device for Source 206 and the associated dryers.

(b) No other sources shall be connected to the RTO without prior written approval from the Department.

Fuel Restriction(s).**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall only use natural gas as a fuel in the RTO.

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

The dryers, total enclosure and the RTO shall be operated for at least 15 minutes after the last application of VOC based materials in Source 206.

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

All VOC emissions from Source 206 and any VOC emitting processes associated with Source 206 shall be ducted to this RTO at all times that Source 206 is in operation.

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

(a) The permittee shall maintain at least a 98.0% VOC destruction efficiency in the RTO, or a post control minimum outlet VOC concentration not to exceed 20.0 ppm as methane on a dry basis.

(b) Prior to the operation of Source 206, the RTO combustion chamber temperature shall be operating at a minimum temperature of 1,500° F. The permittee shall operate the RTO using the manufacturer's recommended temperatures until source testing is completed and operating temperatures can be established and rolled into the Operating Permit.

(c) The dryers, total enclosure and the RTO shall be operated at all times while materials containing VOCs, to include cleaning solvent, are being applied to Source 206.

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

(a) The permittee shall perform a source test, using Department-approved procedures, to show compliance with the RTOs VOC destruction efficiency of 98.0%. During testing the permittee shall use the RTO manufacturer's recommended operating temperatures. The testing shall be performed within 180 days after startup of Source 206.

(b) The permittee shall perform the source test in accordance with 25 Pa. Code Chapter 139 and the latest edition of the Department's Source Testing Manual (Document No. 274-0300-002). Testing 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

**SECTION D. Source Level Requirements**

may be requested by the Department. The permittee shall operate the RTO using the manufacturer's recommended temperatures until source testing is completed and operating temperatures can be established and rolled into the Operating Permit.

(c) Testing shall be conducted at the combustion chamber inlet and outlet of the RTO to demonstrate compliance with the VOC destruction efficiency of 98.0%, or a post control emission of 20.0 ppmvd or less as methane, whichever is less stringent. The VOC test results are to be expressed as methane. Also, the permittee shall conduct a source test to determine the emission rates of: VOC, NO_x and CO at the outlet of the RTO in pounds per hour.

(d) The following process data shall be recorded during each test run to document the operation of Source 206:

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

(e) The RTO operating temperature (°F) shall be recorded at least every fifteen (15) minutes during each test run to document the operation of the RTO.

(f) At the same time as the above source test the permittee shall also perform a source test in accordance with the provisions of Chapter 139 of the rules and regulations to measure the total enclosure capture efficiency of TE6 using EPA Method 204.

(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), one paper copy plus 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.

(k) If DEP Source Testing Program determines that the source test is not acceptable to use for compliance purposes, the permittee will be required to retest in accordance with conditions specified in Plan Approvals 09-0027I and 09-0027J and other such conditions, within the capacity of the equipment, which may be requested by DEP.

007 [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.

Central Office
RA-EPstacktesting@pa.gov

Southeast Region
RA-EPSEstacktesting@pa.gov

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

**SECTION D. Source Level Requirements****(1) Test Date(s).**

- (i) For protocols, provide the proposed date on which testing will commence or "TBD".
- (ii) 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).

- (i) Plan approval number(s).
- (ii) Operating permit number.
- (iii) Applicable federal subpart(s) (i.e. 40 C.F.R. 60, Subpart JJJJ).
- (iv) Special purpose(s) (Consent Order, RFD, RACT II, 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".

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

The permittee shall monitor the amount of natural gas used in the RTO on a monthly basis.

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

- (a) The combustion chamber temperature of the RTO shall be visually displayed.
- (b) The RTO combustion chamber temperature must be continuously monitored while the RTO is operating.
- (c) The permittee shall continuously monitor the inlet airflow to the RTO while the RTO is operating.
- (d) The permittee shall monitor the startup and shutdown times of the RTO.

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

The inward flow of air from all natural draft openings into the total enclosure shall be verified by continuous observation of streamers, or other means approved by the Department, maintained at the natural draft openings while Source 206 is operating.

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

- (a) The permittee shall record the amount of natural gas used in the RTO on a monthly basis.
- (b) The permittee shall calculate and record the NOx and VOC emissions from the RTO on a monthly basis and a 12-month consecutive basis.
 - (1) NOx and VOC emissions shall be recorded in tons per year.
- (c) The permittee shall use the latest EPA AP-42 emission factors and the amount of fuel used in the RTO when calculating and recording the NOx and VOC emissions from the RTO. After source testing has been completed and the source test results have been reviewed and approved by the Department's Source Testing Section the permittee shall use an emission factor demonstrated during the test to calculate NOx and VOC emissions.

**SECTION D. Source Level Requirements****# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The permittee shall continuously record the RTO combustion chamber temperature while the RTO is operating. The temperature recording shall be performed using a Department approved method.
- (b) The permittee shall continuously record the inlet airflow to the RTO while the RTO is operating.
- (c) The permittee shall record the startup and shutdown times of the RTO on daily basis.

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

- (a) The permittee shall record all excursions and any corrective actions taken in response to an excursion.
- (b) The permittee shall record the time elapsed between the excursion and when the corrective action has been taken.
- (c) The permittee shall record all inspections, repair, and maintenance performed on the RTO.
- (d) The permittee shall maintain records of all monitoring downtime incidents. The permittee shall also record the dates, times and durations, probable causes and corrective actions taken for the incidents.
- (e) The permittee shall maintain one digital copy of the manufacturer's operating manual onsite at all times.

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

The permittee shall maintain all records for a minimum of five years and these records shall be made readily available to the Department.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) When starting the RTO, the permittee shall ensure that the normal start-up and shutdown procedures are followed as indicated in the manufacturer's operating manual.
- (b) The permittee shall maintain a copy of the manufacturer's startup and shutdown procedures for the RTO.

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

- (a) The permittee shall follow the following procedures if an excursion occurs to the RTO.
- (1) During an excursion no new solvent-based materials may be fed to Source 206.
- (2) Should the permittee continue to operate Source 206 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.

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

- (a) The RTO shall be operated and maintained in accordance with the manufacturer's recommendations.
- (b) The permittee shall create an inspection checklist similar to the checklist in Section 7 of the manufacturer's operating manual. The Checklist shall include sections for daily, monthly, quarterly, semi-annual, and annual inspections as needed

**SECTION D. Source Level Requirements**

to ensure proper operation of the RTO.

(c) The checklist will then be approved by the Department before incorporation into the Operating Permit.

018 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall install an electronic data recording system which continuously records the combustion chamber center temperature.

VII. ADDITIONAL REQUIREMENTS.

019 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The RTO is manufactured by Ship & Shore Environmental, Inc., Model No. SSE-56K-95X-RTO.

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



SECTION E. Source Group Restrictions.

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
031	SUPERIOR BOILER 502		
Emission Limit		Pollutant	
400.000	PPMV	3% O ₂	CO
30.000	PPMV	3% O ₂ (Natural Gas)	NOX
90.000	PPMV	3% O ₂ (No.2 fuel oil)	NOX
202	ROTOGRAVURE PRESS (8 STATIONS)		
Emission Limit		Pollutant	
32.000	Tons/Yr		VOC
36.100	Lbs/Hr	averaged daily	VOC
564.000	Lbs/Day		VOC
203	ROTOGRAVURE PRESS (11 STATIONS)		
Emission Limit		Pollutant	
30.000	Tons/Yr	VOC emissions and press clean-up solvent emissions calculated on a 12-month rolling sum	VOC
50.000	Lbs/Hr	VOC emissions and press clean-up solvent emissions averaged daily	VOC
600.000	Lbs/Day	VOC emissions and press clean-up solvent emissions	VOC
204	FLEXOGRAPHIC PRESS (8 STATIONS) & 3 LAMINATORS		
Emission Limit		Pollutant	
17.150	Lbs/Hr	averaged daily	VOC
39.550	Tons/Yr	oxidizer, clean-up solvents & dryer	VOC
205	ROTOGRAVURE PRESS & SOLVENT DISTILLATION SYSTEM		
Emission Limit		Pollutant	
7.200	Lbs/Hr	Total VOC emissions averaged daily	VOC
17.580	Tons/Yr	Total VOC emissions calculated on 12 month rolling sum	VOC
206	BOBST LAMINATOR (3 STATIONS)		
Emission Limit		Pollutant	
19.200	Tons/Yr		VOC
310	INK MIXING		
Emission Limit		Pollutant	
2.690	Tons/Yr		VOC
901	MISCELLANEOUS RACT OP SOURCES		
Emission Limit		Pollutant	
2.690	Tons/Yr	Calculated on a 12-month rolling sum	VOC
3.000	Lbs/Hr		VOC
15.000	Lbs/Day		VOC

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description
904	80KW EMERGENCY GENERATOR ENGINE
Emission Limit	
2.750 Tons/Yr	caluculated during the ozone season
6.600 Tons/Yr	calculated on a 12-month rolling sum
100.000 Lbs/Hr	
1,000.000 Lbs/Day	

Site Emission Restriction Summary

Emission Limit		Pollutant
24.990 Tons/Yr		NOX
10.000 Tons/Yr	For any individual HAP	Hazardous Air Pollutants
25.000 Tons/Yr	For any combination of HAPs	Hazardous Air Pollutants

**SECTION H. Miscellaneous.**

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

RACT Permit: OP-09-0027

Operating Permits: GP 09-312-024, GP 09-320-025, GP 09-323-005.

(b) The Department has determined that the following sources are exempted from monitoring, recordkeeping, or testing requirements:

(1) AST: One (1) aboveground No. 2 fuel oil storage tank with a 5,600 gallon capacity.

(2) Spray Booth: One (1) paint spray booth used for maintenance activities.

(3) Burn-Off Oven: One (1) burn-off oven used to burn off debris from extruder parts. (Approximately 53 lbs./year VOC).

(4) BioBlaster: Anilox roll cleaning system to clean press cylinders with silicone-base abrasive. Totally self contained unit that exhausts to facility interior at <5000 cfm.

(5) Welding Hoods: Maintenance and production related activities.

(6) Laboratory Hoods: To capture fugitive emissions related to QA/QC activities on the press floor.

(7) Misc. Sources: Bag Machines/Slitter, Pouch Machines, Injection Molding Machines and Trim Scrap baghouse.

(8) Washroom Soak Tank: Soaking of print rollers from presses in VOC-containing solvent to remove dried ink. The permittee shall keep on hand an MSDS for the VOC containing solvent used in the washroom soak tank.

(9) Valve assembly machine 9: PM De minimis increase is 0.003 tpy (permittee shall keep records to demonstrate compliance with Pa. Code 127.449(d)(4) as instructed in RFD approval # 1694.

(c) APS:346619 AUTH: 383261, The amendment addresses the following

(1) incorporation of Plan Approval PA 09-0027D, which superseded PA 09-320-049, for sources 203, rotogravure press and 204, flexographic press

(2) incorporation of Plan Approval PA 09-0027C, for Source 303 rubber roller resurfacing lathe with a cyclone and baghouse, and

(3) concerns expressed in appeal submitted to the Department on February 2002.

ALTERNATE MONITORING FOR THE BOILERS:

The company shall monitor the total fuel usage for the two boilers and the respective fuel usage for each boiler shall be apportioned with respect to the operating hours and the rated heat inputs of each boiler. The alternate monitoring of the fuel usage will satisfy the recordkeeping requirements of New Source Performance Standards (NSPS) for Small Industrial, Commercial, & Institutional Steam Generating Units. (40 CFR 60.48c).

(d) APS: 346619 AUTH: 643322, This Title V permit has been renewed.

(1) The renewal addresses CAM and the Department has changed the deviation and compliance certification reporting requirements. Refer to Section C, Record Keeping, condition #015.

(2) The renewal incorporates two plan approvals, PA-09-0027E and PA-09-0027F.

(e) APS: 698810, AUTH: 801134

(1) This permit was reopened in accordance with 25. Pa. Code Section 127.542(a)(3), to correct a mistake made to condition No. 002 and 006 for Source ID 703 and 704. The requirement for a pressure relief valve test has been removed. The conditions were corrected to state that the permittee shall perform manual inspections and cleanings for the pressure relief valves on an annual basis.

**SECTION H. Miscellaneous.**

(2) The Department made a change to Source ID 303, condition number 004(c) and condition number 005(d). Weekly inspections and recordkeeping of the filters was changed to monthly.

(f) August 2010, APS: 698810, AUTH: 845316

(1) The Department issued a Minor Modification to change the language for Source T01 and T05 condition number 001 for both oxidizers and the associated monitoring and recordkeeping conditions.

Condition number 001 for both oxidizers stated airflow limits without a monitoring frequency. The Department clarified the condition to state the limits are expressed as an hourly average.

(g) APS # 698810, AUTH # 895581, This Title V Permit has been renewed

(1) Source ID 903 (2ER GENS) was removed from Section D of the permit and placed in Section G as the sources are rated at 7.5 kw and 15 kw and run on natural gas. The permittee shall keep records of the hours of operation and keep records to demonstrate compliance with 40 C.F.R. 63.6603(a) for both the 7.5 and 15 kw generators.

(2) 25 Pa Code 127.14(a)(8)(4) under the exemption criteria serves as the basis for this decision. Each generator is still limited to less than 500 hours per year calculated on a 12-month rolling sum.

(3) Source ID 904 (80 kw Emergency Generator) was installed under RFD # 1773 approved by the Department on October 13, 2010 under the emission exemption criteria in 25 Pa. Code 127.14(a)(8)(6) which serves as the basis for the emission limits for Source 904 set forth in this permit.

(h) APS: 698810 AUTH: 1020039, This Amendment is to incorporate Plan Approval 09-0027H (Rotogravure Press, Source ID 203) and Plan Approval 09-0027G (Roto Press & Solvent Dist Sys, Source ID 205) in the Title V Operating Permit.

(i) APS: 698810, AUTH: 1031848, This permit was reopened for cause in accordance with 25 Pa. Code 127.542(a)(3), to correct mistakes and inaccurate statements.

(1) Source ID 201 (Rotogravure Press-9 station) was removed and replaced with Source ID 205 through Plan Approval 09-0027G, during the incorporation of Plan Approval 09-0027G, all references to Source ID 201 were left in the permit instead of being removed.

(2) The stack testing requirement for Source ID T05 (Adwest Thermal Oxidizer) was deleted from the permit during the incorporation of Plan Approval 09-0027G and had to be inserted back into the permit.

(3) The Department of Environmental Protection approved monthly monitoring of malodor, fugitive emissions and visible emissions on September 9, 2003. The Department reserves the right to change the frequency as described in Condition No. 011 of Section C of this permit.

(4) Source ID 031 (Superior Boiler 502) and Source ID 032 (York Shipley Boiler 501), conditions pertaining to 40 C.F.R 63 Subpart JJJJJ have been removed. Fres-co burns natural gas as the primary fuel for these 2 boilers and only No. 2 fuel oil during periods of curtailment. Conditions to demonstrate compliance with being exempt from Subpart JJJJJ have been added to the permit. Fres-co notified the DEP and EPA by letter on March 25, 2013 of the change from dual fired to natural gas fired boilers.

(5) Source ID T01 (HES Thermal Oxidizer) and Source ID T05 (Adwest Thermal Oxidizer). A condition was added under additional requirements to define exceedance and excursion in accordance with 40 C.F.R. 64.1 and the CAM plan that was submitted to the Department by Fres-co on July 31, 2006 with the renewal permit application.

(j) 2017, APS: 698810 AUTH: 1151706, This Title V permit has been renewed.

(k) June 2019, APS ID#: 698810 AUTH ID#: 1275821

(1) In accordance with 25 Pa. Code §127.542 (a)(3), the Department has opened for cause TVOP-09-00027 to remove Condition #004 for Source 031 Superior Boiler because the source testing condition was inadvertently included in the 2017 Permit renewal.

(2) Source No. 705 Ethyl Acetate 10,000 Gal AST was added. Also, the permittee previously submitted RFD No. 7114 in which the Department determined the tank is exempt from Plan Approval.

**SECTION H. Miscellaneous.**

(l) June 2022, TVOP renewal under AUTH ID 1373700 and APS ID 698810, with the following modifications.

(1) Ethyl Acetate tank (Source ID 705) was exempt from plan approval under RFD No. 7114. The two ethyl acetate tanks (Source IDs 704 and 705) are listed here in Section H based on the minimal VOC emissions from each tank and are considered trivial activities.

(2) N-Propyl Acetate tank (Source ID 702) and Isopropanol tank (Source ID 703) have been moved from Section D to Section H based on the minimal VOC emissions from the tank and is considered a trivial activity.

(3) HP Indigo 20000 Digital Press was exempt from plan approval under RFD No. 8320 and is considered a trivial activity based on the minimal VOC emissions from this source of less than 1.00 ton per year.

(4) Boilers (Source IDs 031 & 032) are no longer subject to 40 CFR Part 63 Subpart JJJJJJ because the permittee has requested to fire only natural gas in the boilers and the fuel tanks for each source have been removed.

(m) February 2023, Fres-co's Air Quality Operating Permit 09-00027 was issued on May 31, 2022 and in that issuance a reporting condition to submit annual and semiannual compliance certifications was omitted from Section C. The Department has now included the reporting condition #020 to Section C. No other conditions were changed, and no action was required by Fres-co.

(n) September 2023, AUTH ID 1439882 & APS ID No. 698810, minor modification to incorporate RACT III requirements for Source IDs 302, 310 & 901.

(1) VOC emissions from Source ID 310 was changed from 5.00 tons per year to less than 2.70 tons per year calculated on a 12-month rolling sum.

(2) Source ID 310 annual ink throughput shall not exceed 1,434,000 lb/yr as a 12-month sum was added.

(3) RACT III presumptive work practice requirements were added for Source IDs 302, 310 & 901.

(o) July 2026, AUTH ID 1571143 & APS ID No. 698810, administrative amendment to incorporate Plan Approvals 09-0027I and 09-0027J for Source IDs 206, T06, and TE6.



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