



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

**STATE ONLY SYNTHETIC MINOR OPERATING PERMIT**

Issue Date: April 26, 2022

Effective Date: September 1, 2022

Expiration Date: August 31, 2027

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

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

**State Only Permit No: 67-05084**

Synthetic Minor

Federal Tax Id - Plant Code: 23-1242470-2

**Owner Information**

Name: YORK WALLCOVERINGS INC

Mailing Address: 2075 LOUCKS RD  
YORK, PA 17408-9704

**Plant Information**

Plant: YORK WALLCOVERINGS INC/FORMER GTY

Location: 67 York County

67963 West Manchester Township

SIC Code: 2679 Manufacturing - Converted Paper Products, Nec

**Responsible Official**

Name: JOE STEFKO

Title: VP US OPERATIONS

Phone: (717) 846 - 4456

Email: stefkoj@yorkwall.com

**Permit Contact Person**

Name: HEATHER SCHNEIDER

Title: REGULATORY MGR

Phone: (717) 846 - 4456

Email: schneiderh@yorkwall.com

[Signature] \_\_\_\_\_

WILLIAM R. WEAVER, SOUTH CENTRAL REGION AIR PROGRAM MANAGER



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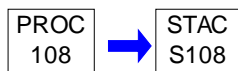
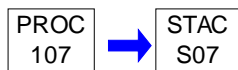
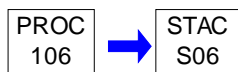
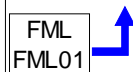
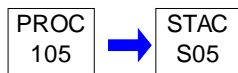
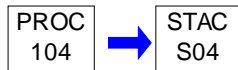
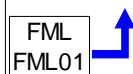
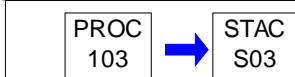
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Source ID	Source Name	Capacity/Throughput	Fuel/Material
103	WIDE HOT EMBOSSER/COATER	11.000 Gal/HR	INK
		16.500 MMCF/HR	Natural Gas
104	#43 NARROW GRAVURE PRESS	50.000 Gal/HR	INK
105	NARROW HOT EMBOSSER	23.600 Th Ft/HR	PAPER
		2.000 MMCF/HR	Natural Gas
106	#44 NARROW GRAVURE PRESS	50.000 Gal/HR	INK
107	WIDE GRAVURE PRESS	50.000 Gal/HR	INK
108	WIDE ROTOMECH GRAVURE PRESS W/EMBOSSING	67.000 Lbs/HR	INK
FML01	NATURAL GAS		
S03	WIDE HOT EMBOSSER/COATER STACK		
S04	#43 NARROW GRAVURE PRESS STACK		
S05	NARROW HOT EMBOSSER STACK		
S06	#44 NARROW GRAVURE PRESS STACK		
S07	WIDE GRAVURE PRESS STACK		
S108	ROTOMECH PRESS STACK		

**PERMIT MAPS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



**SECTION B. General State Only Requirements**

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION B. General State Only Requirements**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving, and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars, and other vehicular equipment are not considered as emissions from the use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Sources and classes of sources other than those identified in (a)(1)-(a)(5), above, for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

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

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

**# 002 [25 Pa. Code §123.2]****Fugitive particulate matter**

No person shall permit the emission of fugitive particulate matter into the outdoor atmosphere from a source specified in Section C, Condition #001, if the emissions are visible at the point the emissions pass outside the person's property.

**# 003 [25 Pa. Code §123.31]****Limitations**

No person shall 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.

**# 004 [25 Pa. Code §123.41]****Limitations**

No person shall permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

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

**# 005 [25 Pa. Code §123.42]****Exceptions**

The emission limitation of 25 Pa. Code Section 123.41, shall not apply when:

- (1) The presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (3) The emission results from sources specified in Section C, Condition #001, subsections (a)(1)-(a)(7).

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

The permittee shall limit the facility emissions to the outdoor atmosphere at less than the following figures based on a 12-month rolling total:

- (a) Oxides of nitrogen (NO<sub>x</sub>) - 100 tons
- (b) Oxides of sulfur (SO<sub>x</sub>) expressed as SO<sub>2</sub> - 100 tons
- (c) Volatile organic compounds (VOC) - 50 tons
- (d) Particulate matter with an effective aerodynamic diameter of less than or equal to a nominal 10 micrometer body (PM<sub>10</sub>) - 100 tons
- (e) Particulate matter with an aerodynamic diameter of less than or equal to a nominal 2.5 micrometer body (PM<sub>2.5</sub>) - 100 tons
- (f) Carbon monoxide - 100 tons
- (g) Any single hazardous air pollutant (HAP) - 10 tons, and
- (h) Total HAPs emissions - 25 tons

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

The permittee shall not spray-apply to a plastic and/or metal substrate on a part or product any coating which contains any of the following HAPs: chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). A coating contains these compounds if it contains any of the above individual HAPs at a concentration greater than 0.1 percent by weight.

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

- (a) No person shall conduct open burning of materials.
- (b) Exceptions. The requirements of Subsection (a) do not apply where the open burning operations result from:
  - (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public official.
  - (2) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
  - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
  - (4) A fire set solely for recreational or ceremonial purposes.
  - (5) A fire set solely for cooking food.

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

The Department reserves the right to require exhaust stack testing of the sources referenced in this permit to measure emissions for purposes including verification of permit condition compliance and estimation of annual air emissions.

**SECTION C. Site Level Requirements****# 010 [25 Pa. Code §139.1]****Sampling facilities.**

Upon the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such sources. In the request, the Department will set forth the time period in which the facilities shall be provided as well as the specifications for such facilities.

**III. MONITORING REQUIREMENTS.****# 011 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

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

The permittee shall conduct a monthly inspection around the plant periphery during daylight hours when the plant is in production to detect visible emissions, fugitive emission, and malodorous air contaminants. Monthly inspections are necessary to determine:

- (a) The presence of visible emissions. Visible emissions may be measured according to the methods specified in Section C, Condition #011. Alternately, plant personnel who observe visible emissions may report the incident of visible emissions to the Department within two (2) hours of the incident.
- (b) The presence of fugitive emission beyond the plant property boundaries, as stated in Section C, Condition #002.
- (c) The presence of odorous air contaminants beyond the plant property boundaries, as stated in Section C, Condition #003.

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

The permittee shall maintain records of monthly inspections referenced in Section C, Condition #012. The records shall include, at a minimum, the following information:

- (1) The name of the company representative monitoring these instances.
- (2) The date and time of the observation.
- (3) The wind direction during each observation.

The permittee shall retain these records for a minimum of five (5) years. The records shall be made available to the Department upon request.

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

All records required by this operating permit and subsequent issuances shall be maintained for the most recent five-year period and made available to Department representatives upon request.

**SECTION C. Site Level Requirements****# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The following information shall be collected and recorded at least on a monthly basis:

- a. Press/embosser run time (hours or impressions)
- b. Materials containing VOCs and HAPs (for each press/embosser)
  - (1) manufacturer
  - (2) product number and type
  - (3) usage (by weight or volume)
  - (4) density (s.g. or lbs.gal.)
  - (5) VOC content (% by weight) as applied
  - (6) hazardous air pollutants (type and % by weight)
- c. For VOC emission calculations purposes, the total quantities of each pollutant shall be determined from the actual VOCs in each material and the quantities of each of those materials used rather than using overall averages.

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

The permittee shall, monthly, unless another period is specified, record the quantities of all air contaminants listed in Section C, Condition #006. This list of contaminants shall be broken down on a source by source basis. The permittee shall perform monthly calculations to demonstrate compliance with the 12 consecutive month limitations.

**V. REPORTING REQUIREMENTS.****# 017 [25 Pa. Code §127.442]****Reporting requirements.**

The permittee shall report malfunctions which occur at the facility to the Department. As defined in 40 CFR Section 60.2 and incorporated by reference in 25 Pa. Code Chapter 122, 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 unusual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

- (a) Any malfunction which poses an imminent danger to public health, safety, welfare and environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two hours after discovery of the incident. Telephone reports can be made to the Air Quality Program at 717-705-4702 during normal business hours, or to the Department's Emergency Hotline at 1800-541-2050. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at <https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx>. The permittee shall submit a written report of instances of such malfunctions to the Department within three (3) business days of the telephone report.
- (b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirements of paragraph one above, shall be reported to the Department, in writing, within five (5) days of discovery of the malfunction.

**# 018 [25 Pa. Code §135.3]****Reporting**

- (a) An annual air emissions report for a given calendar year is due no later than March 1 of the following year. The annual emissions statement (AES report) shall be submitted to the Air Quality District Supervisor, electronically AES online, through the Department's (DEP's) greenport website: <https://www.depgreenport.state.pa.us>
- (b) The monthly air emissions and calculations referenced in Conditions #006 and #016 of Section C shall be included in the annual air emissions report.
- (c) The permittee may request an extension of time from the Department for the filing of the air emissions report specified in part (a), above, and the Department may grant the extension for reasonable cause.



**SECTION C. Site Level Requirements****# 019 [25 Pa. Code §135.3]****Reporting**

Source owners or operators shall maintain and make available upon request by the Department, records including computerized records that may be necessary to comply with 25 Pa. Code Sections 135.3 and 135.21 (relating to reporting, 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.

**VI. WORK PRACTICE REQUIREMENTS.****# 020 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne from any source specified in Section C, Condition #001(a)(1)-(a)(6). These actions shall include, but are not limited to, the following:

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

**# 021 [25 Pa. Code §127.444]****Compliance requirements.**

The permittee shall operate and maintain all sources and any air cleaning devices identified in this operating permit in accordance with the manufacturer's recommendations/specifications, as well as in a manner consistent with good operating practices.

**VII. ADDITIONAL REQUIREMENTS.****# 022 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

Operation of any air emissions source is contingent upon proper operation of its associated emissions control system, unless otherwise approved by the Department.

**VIII. COMPLIANCE CERTIFICATION.**

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

**IX. COMPLIANCE SCHEDULE.**

No compliance milestones exist.

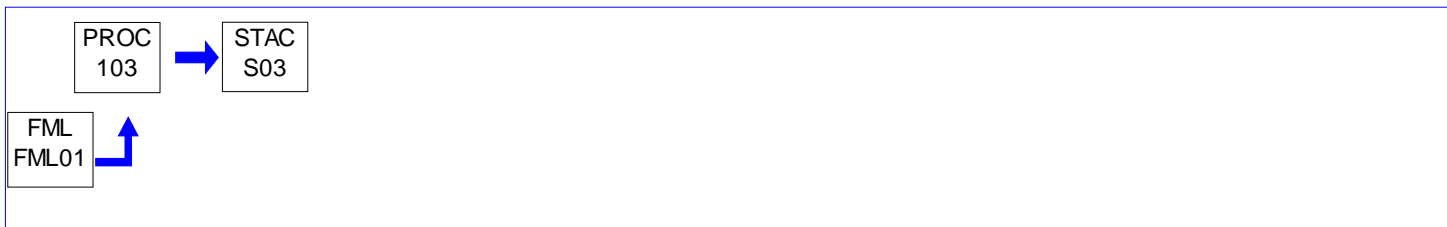
**SECTION D. Source Level Requirements**

Source ID: 103

Source Name: WIDE HOT EMBOSSER/COATER

Source Capacity/Throughput:	11.000 Gal/HR	INK
	16.500 MMCF/HR	Natural Gas

Conditions for this source occur in the following groups: GROUP 01  
GROUP 02

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

Based on a 12-month rolling total, the permittee shall limit Source ID 103 emissions to the outdoor atmosphere at less than 25 tpy of VOC from coatings that are applied in a continuous, uniform layer to paper, film or foil surfaces, and pressure-sensitive tapes, regardless of substrate.

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

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

The permittee shall calculate monthly emissions for each calendar month and total emissions for each consecutive 12-month period for volatile organic compounds (VOCs) from Source ID 103 coatings to demonstrate compliance with Condition #001 above.

All records shall be maintained on site for the most recent five-year period and made available to Department representatives upon request.

**V. REPORTING REQUIREMENTS.**

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

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

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

**VII. ADDITIONAL REQUIREMENTS.**

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

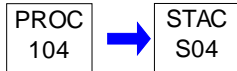
**SECTION D. Source Level Requirements**

Source ID: 104

Source Name: #43 NARROW GRAVURE PRESS

Source Capacity/Throughput: 50.000 Gal/HR INK

Conditions for this source occur in the following groups: GROUP 02

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

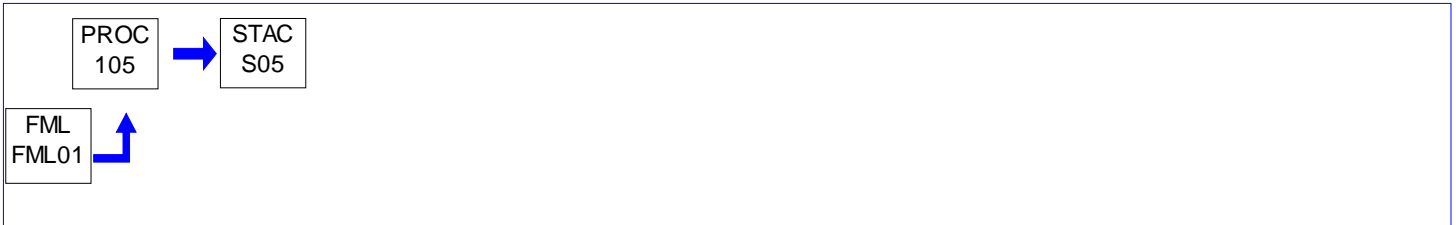
**SECTION D. Source Level Requirements**

Source ID: 105

Source Name: NARROW HOT EMBOSSEER

Source Capacity/Throughput:	23.600 Th Ft/HR	PAPER
	2.000 MMCF/HR	Natural Gas

Conditions for this source occur in the following groups: GROUP 02

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

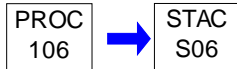
**SECTION D. Source Level Requirements**

Source ID: 106

Source Name: #44 NARROW GRAVURE PRESS

Source Capacity/Throughput: 50.000 Gal/HR INK

Conditions for this source occur in the following groups: GROUP 02

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

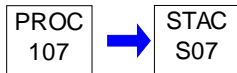
**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: WIDE GRAVURE PRESS

Source Capacity/Throughput: 50.000 Gal/HR INK

Conditions for this source occur in the following groups: GROUP 02

**I. RESTRICTIONS.**

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.**

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

**VII. ADDITIONAL REQUIREMENTS.**

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

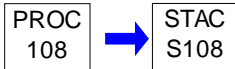
**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: WIDE ROTOMECH GRAVURE PRESS W/EMBOSSING

Source Capacity/Throughput: 67.000 Lbs/HR INK

Conditions for this source occur in the following groups: GROUP 02

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

Pursuant to the Best Available Technology provisions of 25 PA Code §§ 127.1 and 127.12, the permittee shall use inks with a weighted average VOC content less than 1.0 pound VOC per pound ink solids at the Wide Rotomech Gravure Press, Source ID 108.

**II. TESTING REQUIREMENTS.**

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

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

To demonstrate compliance with Condition 001 above, the permittee shall determine the weighted average VOC content of the inks used in accordance with the methods and procedures specified in 40 CFR Part 60, Subpart FFF.

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

The permittee shall calculate and keep records of the weighted average VOC content of inks used as determined in accordance Condition 002 above.

**V. REPORTING REQUIREMENTS.**

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

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

Pursuant to the Best Available Technology provisions of 25 PA Code §§ 127.1 and 127.12, the permittee shall operate and maintain the Rotomech Gravure Press, Source ID 108 in accordance with the manufacturer's recommendations/specifications, as well as in a manner consistent with good operating practices.



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

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

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 01

Group Description: 129.52b Paper, Film or Foil surface coating processes

Sources included in this group

ID	Name
103	WIDE HOT EMBOSSER/COATER

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

When applying a coating in a continuous, uniform layer to paper, film or foil surfaces, and pressure-sensitive tapes, regardless of substrate, the coating is subject to the requirements of 25 Pa. Code Section 129.52b.

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

(c) Emission limits. Beginning January 1, 2012, a person subject to subsection (a)(2) may not cause or permit the emission into the outdoor atmosphere of VOCs from a paper, film or foil surface coating process, unless one of the following limitations is met:

- (1) The VOC content of each as applied coating is equal to or less than the limit specified in Table II.

Table II

Emission Limit of VOCs for Paper Coating if Actual VOC Emissions have Exceeded 3 Pounds per Hour, 15 Pounds per Day or 2.7 Tons per Year in Any Year Since January 1, 1987

Weight of VOC per Volume of Coating Solids, as Applied

Units	RACT Limit Paper Coating
lb voc/gal coating solids	4.84
kg voc/l coating solids	0.58

- (i) [N/A - TABLE I LIMITS DO NOT APPLY]

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

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

Where:

VOC = VOC Content in lb voc/gal of coating solids

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

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

Ww = Weight percent of water

Wex = Weight percent of exempt solvent(s)

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

Vn = Volume percent of solids of the as applied coating

- (iii) [N/A - THE FACILITY DOES NOT DIP COAT]

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

**SECTION E. Source Group Restrictions.**

(2) [N/A - CONTROL DEVICE IS NOT USED]

129.52b(d) & (e) - [REQUIREMENTS IN RECORDKEEPING SECTION]

(f) [N/A - FACILITY IS NOT SUBJECT TO THE REQUIREMENTS OF SUBSECTION (a)(1), SINCE THE POTENTIAL TO EMIT OF VOCS FOR SOURCE ID 103 COATING OPERATIONS ARE LESS THAN 25 TONS PER YEAR]

(g) Exempt coatings. The VOC coating content limits in Tables I and II do not apply to a coating used exclusively for determining product quality and commercial acceptance and other small quantity coatings, if the coating meets the following criteria:

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

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

**II. TESTING REQUIREMENTS.**

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

**III. MONITORING REQUIREMENTS.**

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

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

(d) Compliance monitoring procedures. The owner or operator of a facility subject to this section shall maintain records sufficient to demonstrate compliance as follows:

(1) The owner or operator of a facility subject to subsection (a) shall maintain daily records of the following parameters for each coating, thinner, component or cleaning solvent, as supplied:

(i) Name and identification number of the coating, thinner, component or cleaning solvent.

(ii) Volume used.

(iii) Mix ratio.

(iv) Density or specific gravity.

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

(vi) VOC content.

(2) In addition to the records required under paragraph (1), the owner or operator of a facility subject to subsection (a)(2) shall maintain daily records of the volume percent solids for each coating, thinner or component, as supplied.

(3) The owner or operator of a facility subject to subsection (a) shall maintain daily records of the VOC content of each as applied coating or cleaning solvent.

**SECTION E. Source Group Restrictions.**

(e) Recordkeeping and reporting requirements. The records required under subsection (d) shall be:

- (1) Maintained for 2 years, unless a longer period is required under § 127.511(b)(2) (relating to monitoring and related recordkeeping and reporting requirements).
- (2) Submitted to the Department upon receipt of a written request.

**V. REPORTING REQUIREMENTS.**

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

**VI. WORK PRACTICE REQUIREMENTS.****# 004 [25 Pa. Code §129.52b]****Control of VOC emissions from paper, film and foil surface coating processes.**

(h) Work practice requirements for cleaning materials. The owner or operator of a paper, film or foil surface coating process subject to subsection (a) shall comply with the following work practices for cleaning materials:

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

**VII. ADDITIONAL REQUIREMENTS.****# 005 [25 Pa. Code §129.52b]****Control of VOC emissions from paper, film and foil surface coating processes.**

(a) Applicability. This section applies to the owner and operator of a paper, film or foil surface coating process, as follows, if the surface coating process meets one or a combination of the following:

- (1) [N/A - THE POTENTIAL TO EMIT OF VOCS FOR SOURCE ID 103 COATING OPERATIONS ARE LESS THAN 25 TONS PER YEAR]
- (2) The emission limit in Table II and other requirements of this section apply to the owner and operator of a paper surface coating process which emits or has emitted VOCs into the outdoor atmosphere in quantities greater than 3 pounds (1.4 kilograms) per hour, 15 pounds (7 kilograms) per day or 2.7 tons (2,455 kilograms) per year during any calendar year since January 1, 1987. For these processes, the emission limit and other requirements of this section supersede the emission limit and other requirements of § 129.52.
- (3) The work practice requirements for cleaning materials found in subsection (h), and the related compliance monitoring and recordkeeping and reporting requirements of subsections (d) and (e), apply to the owner and operator of a paper, film or foil surface coating process if the total actual VOC emissions from all paper, film or foil surface coating operations, including related cleaning activities, at the facility are equal to or greater than 15 pounds (6.8 kilograms) per day or 2.7 tons (2,455 kilograms) per 12-month rolling period, before consideration of controls.

(b) [N/A - FACILITY DOES NOT HAVE A RACT PERMIT]

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 02

Group Description: 40 CFR Part 60, Subpart FFF Requirements

Sources included in this group

ID	Name
103	WIDE HOT EMBOSSER/COATER
104	#43 NARROW GRAVURE PRESS
105	NARROW HOT EMBOSSER
106	#44 NARROW GRAVURE PRESS
107	WIDE GRAVURE PRESS
108	WIDE ROTOMEC GRAVURE PRESS W/EMBOSSING

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.582]****Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing Standard for volatile organic compounds.**

60.582(a)

On and after the date on which the performance test required by § 60.8 has been completed, each owner or operator subject to this subpart shall either:

60.582(a)(1)

Use inks with a weighted average VOC content less than 1.0 kilogram VOC per kilogram ink solids (1.0 pound VOC per pound ink solids) at each affected facility, or

60.582(a)(2) [N/A - AN EMISSION CONTROL DEVICE IS NOT USED]

60.582(b)

[Reserved]

**II. TESTING REQUIREMENTS.****# 002 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.583]****Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing Test methods and procedures.**

60.583(a)

Methods in appendix A of this part, except as provided under § 60.8(b), shall be used to determine compliance with § 60.582(a) as follows:

60.583(a)(1)

Method 24 for analysis of inks. If nonphotochemically reactive solvents are used in the inks, standard gas chromatographic techniques may be used to identify and quantify these solvents. The results of Method 24 may be adjusted to subtract these solvents from the measured VOC content.

60.583(a)(2) - (a)(6) [N/A - AN EMISSION CONTROL DEVICE IS NOT USED]

60.583(b)

To demonstrate compliance with § 60.582(a)(1), the owner or operator of an affected facility shall determine the weighted average VOC content of the inks according to the following procedures:

**SECTION E. Source Group Restrictions.**

## 60.583(b)(1)

Determine and record the VOC content and amount of each ink used at the print head, including the VOC content and amount of diluent solvent, for any time periods when VOC emission control equipment is not used.

## 60.583(b)(2)

Compute the weighted average VOC content by the following equation:

(See equation in Subpart FFF)

## 60.583(b)(3)

The weighted average VOC content of the inks shall be calculated over a period that does not exceed one calendar month, or four consecutive weeks. A facility that uses an accounting system based on quarters consisting of two 28 calendar day periods and one 35 calendar day period may use an averaging period of 35 calendar days four times per year, provided the use of such an accounting system is documented in the initial performance test.

## 60.583(b)(4)

Each determination of the weighted average VOC content shall constitute a performance test for any period when VOC emission control equipment is not used. Results of the initial performance test must be reported to the Administrator. Method 24 or ink manufacturers' formulation data along with plant blending records (if plant blending is done) may be used to determine VOC content. The Administrator may require the use of Method 24 if there is a question concerning the accuracy of the ink manufacturer's data or plant blending records.

## 60.583(b)(5)

If, during the time periods when emission control equipment is not used, all inks used contain less than 1.0 kilogram VOC per kilogram ink solids (1.0 pound VOC per pound ink solids), the owner or operator is not required to calculate the weighted average VOC content, but must verify and record the VOC content of each ink (including any added dilution solvent) used as determined by Method 24, ink manufacturers' formulation data, or plant blending records.

## 60.583(c)

To demonstrate compliance with § 60.582(a)(1), the owner or operator may determine the weighted average VOC content using an inventory system.

## 60.583(c)(1)

The inventory system shall accurately account to the nearest kilogram (pound) for the VOC content of all inks and dilution solvent used, recycled, and discarded for each affected facility during the averaging period. Separate records must be kept for each affected facility.

## 60.583(c)(2)

To determine VOC content of inks and dilution solvent used or recycled, Method 24 or ink manufacturers' formulation data must be used in combination with plant blending records (if plant blending is done) or inventory records or purchase records for new inks or dilution solvent.

## 60.583(c)(3)

For inks to be discarded, only Method 24 shall be used to determine the VOC content. Inks to be discarded may be combined prior to measurement of volume or weight and testing by Method 24.

## 60.583(c)(4)

**SECTION E. Source Group Restrictions.**

The Administrator may require the use of Method 24 if there is a question concerning the accuracy of the ink manufacturer's data or plant records.

60.583(c)(5)

The Administrator shall approve the inventory system of accounting for VOC content prior to the initial performance test.

60.583(d) [N/A - AN EMISSION CONTROL DEVICE IS NOT USED]

**III. MONITORING REQUIREMENTS.**

**# 003 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.584]  
Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing  
Monitoring of operations and recordkeeping requirements.**

60.584(a) [N/A - A SOLVENT RECOVERY EMISSION CONTROL DEVICE IS NOT USED]

60.584(b) [N/A - A THERMAL INCINERATION EMISSION CONTROL DEVICE IS NOT USED]

60.584(c) [N/A - A CATALYTIC INCINERATION EMISSION CONTROL DEVICE IS NOT USED]

60.584(d) [N/A - AN EMISSION CONTROL DEVICE IS NOT USED]

**IV. RECORDKEEPING REQUIREMENTS.**

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

**V. REPORTING REQUIREMENTS.**

**# 004 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.585]  
Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing  
Reporting requirements.**

60.585(a)

For all affected facilities subject to compliance with § 60.582, the performance test data and results from the performance test shall be submitted to the Administrator as specified in § 60.8(a).

60.585(b)

The owner or operator of each affected facility shall submit semiannual reports to the Administrator of occurrences of the following:

60.585(b)(1)

Exceedances of the weighted average VOC content specified in § 60.582(a)(1);

60.585(b)(2) [N/A - A SOLVENT RECOVERY EMISSION CONTROL DEVICE IS NOT USED]

60.585(b)(3) [N/A - A THERMAL INCINERATION EMISSION CONTROL DEVICE IS NOT USED]

60.585(b)(4) [N/A - A CATALYTIC INCINERATION EMISSION CONTROL DEVICE IS NOT USED]

60.585(c)

The reports required under paragraph (b) shall be postmarked within 30 days following the end of the second and fourth calendar quarters.

**SECTION E. Source Group Restrictions.**

60.585(d)

The requirements of this subsection remain in force until and unless the Agency, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with requirements established by the State.

**VI. WORK PRACTICE REQUIREMENTS.**

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

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

The rotogravure presses, and hot embosser/coaters are subject to 40 CFR Part 60, New Source Performance Standards, Subpart FFF, Standards of Performance for Flexible Vinyl and Urethane Coating and Printing and all applicable portions of the General Provisions at 40 CFR Part 60, Subpart A. The permittee shall comply with all applicable requirements of this subpart and shall comply with 40 CFR Section 60.4, which requires submission of copies of all requests, reports, applications, submittals, and other communications to both EPA and the Department. The EPA copies shall be forwarded to:

Director  
Air Protection Division  
U.S. EPA, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

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

In the event that the Federal Subpart that is the subject of this Source Group is revised, the permittee shall comply with the revised version of the subpart, and shall not be required to comply with any provisions in this permit designated as having the subpart as their authority, to the extent that such permit provisions would be inconsistent with the applicable provisions of the revised subpart.

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

Equivalent English units of measurement can be substituted wherever metric units are specified in Section E, Group 02.

**# 008 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.580]****Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing****Applicability and designation of affected facility.**

60.580(a)

The affected facility to which the provisions of this subpart apply is each rotogravure printing line used to print or coat flexible vinyl or urethane products.

60.580(b)

This subpart applies to any affected facility which begins construction, modification, or reconstruction after January 18, 1983.

60.580(c) [N/A - A SOLVENT RECOVERY EMISSION CONTROL DEVICE IS NOT USED]



**SECTION E. Source Group Restrictions.****# 009 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.581]****Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing****Definitions and symbols.**

60.581(a)

All terms used in this subpart, not defined below, are given the same meaning as in the Act or in subpart A of this part.

Emission control device means any solvent recovery or solvent destruction device used to control volatile organic compounds (VOC) emissions from flexible vinyl and urethane rotogravure printing lines.

Emission control system means the combination of an emission control device and a vapor capture system for the purpose of reducing VOC emissions from flexible vinyl and urethane rotogravure printing lines.

Flexible vinyl and urethane products mean those products, except for resilient floor coverings (1977 Standard Industry Code 3996) and flexible packaging, that are more than 50 micrometers (0.002 inches) thick, and that consist of or contain a vinyl or urethane sheet or a vinyl or urethane coated web.

Gravure cylinder means a plated cylinder with a printing image consisting of minute cells or indentations, specifically engraved or etched into the cylinder's surface to hold ink when continuously revolved through a fountain of ink.

Ink means any mixture of ink, coating solids, organic solvents including dilution solvent, and water that is applied to the web of flexible vinyl or urethane on a rotogravure printing line.

Ink solids means the solids content of an ink as determined by Method 24, ink manufacturer's formulation data, or plant blending records.

Inventory system means a method of physically accounting for the quantity of ink, solvent, and solids used at one or more affected facilities during a time period. The system is based on plant purchase or inventory records.

Plant blending records means those records which document the weight fraction of organic solvents and solids used in the formulation or preparation of inks at the vinyl or urethane printing plant where they are used.

Rotogravure print station means any device designed to print or coat inks on one side of a continuous web or substrate using the intaglio printing process with a gravure cylinder.

Rotogravure printing line means any number of rotogravure print stations and associated dryers capable of printing or coating simultaneously on the same continuous vinyl or urethane web or substrate, which is fed from a continuous roll.

Vapor capture system means any device or combination of devices designed to contain, collect, and route organic solvent vapors emitted from the flexible vinyl or urethane rotogravure printing line.

60.581(b)

All symbols used in this subpart not defined below are given the same meaning as in the Act or in subpart A of this part.

a=the gas stream vents exiting the emission control device.

bthe gas stream vents entering the emission control device.

fthe gas stream vents which are not directed to an emission control device.

$C_{aj}$ =the concentration of VOC in each gas stream (j) for the time period exiting the emission control device, in parts per million by volume.

$C_{bi}$ =the concentration of VOC in each gas stream (i) for the time period entering the emission control device, in parts per million by volume.

**SECTION E. Source Group Restrictions.**

$C_{fk}$ =the concentration of VOC in each gas stream (k) for the time period which is not directed to an emission control device, in parts per million by volume.

$G$ =the weighted average mass of VOC per mass of ink solids applied, in kilograms per kilogram.

$M_{ci}$ =the total mass of each ink (i) applied in the time period as determined from plant records, in kilograms.

$M_{dj}$ =the total mass of each dilution solvent (j) added at the print line in the time period determined from plant records, in kilograms.

$Q_{aj}$ =the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in standard cubic meters per hour.

$Q_{bi}$ =the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in standard cubic meters per hour.

$Q_{fk}$ =the volumetric flow rate of each effluent gas stream (k) not directed to an emission control device, in standard cubic meters per hour.

$E$ =the VOC emission reduction efficiency (as a fraction) of the emission control device during performance testing.

$F$ =the VOC emission capture efficiency (as a fraction) of the vapor capture system during performance testing.

$W_{oi}$ =the weight fraction of VOC in each ink (i) used in the time period as determined from Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

$W_{si}$ "means the weight fraction of solids in each ink (i) used in the time period as determined from Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

$W_{oj}$ =the weight fraction of VOC in each dilution solvent (j) added at the print line in the time period determined from Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

[49 FR 26892, June 29, 1984; 49 FR 32848, Aug. 17, 1984, as amended at 65 FR 61768, Oct. 17, 2000]



**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this State Only facility.



**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.

**SECTION H. Miscellaneous.**

#001. The following sources and activities are not subject to any specific work practice standards, testing, monitoring, recordkeeping, or reporting requirements:

- Waste Paper Shredder
- Waste Water Treatment System
- Hot water Heater
- Reznor Heaters
- Xeikon 500D digital press

Items included in the 2022 permit renewal:

- \* Vutek Digital Press
- \* Gravure Proof Press
- \* Offline Wide Embosser [Note: cold mechanical unit]
- \* Nordmeccanica Laminator
- \* EFI Digital Printer
- \* NG Hot Water Heaters, each less than 1.6 mmbtu/hr, range 0.1-0.25 mmbtu/hr each,

#002.

- The E&R shuffle unwind section was replaced on Source ID 107 under a RFD approved by the Department on June 22, 2009.
- A spray coating unit was constructed on the Wide Hot Embosser / Coater, Source ID 103 under a RFD approved by the Department on July 1, 2009.
- A Corona Treater was constructed on the Wide Gravure Press, Source ID 107 under a RFD approved by the Department on October 5, 2011.
- Installation of Tip print press /laminator as per eRFD #3568 approved on 6/5/13.
- Installation of HP latex 360 digital printer as per eRFD #4749 approved on 11/17/14.

#003: For Information: During the term of the previous permit the following RFDs were authorized from 2017-2021 for Loucks Rd. facility:

- RFD 6412: NG Hot Water Heaters,
- RFD 6656: Parts Washer (since removed from site)
- RFD 7036: Offline Wide Embosser [NOTE: Cold mechanical embosser]
- RFD 7834: Vutek Digital Press
- RFD 8023: Gravure Proof Press [NOTE: Proof press]
- RFD 9020: Nordmeccanica Laminator

#004: This operating permit is renewal of the SMOP issued on 8/17/17 and scheduled to expire on 8/31/22.



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

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