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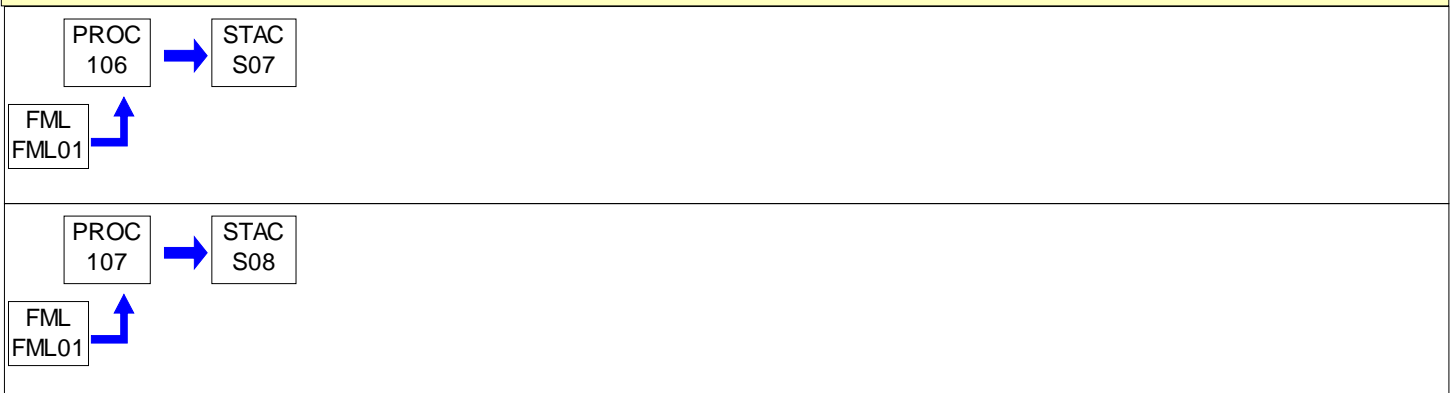
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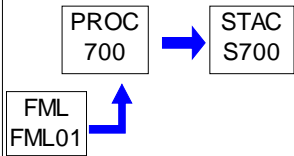
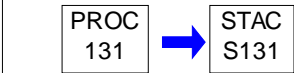
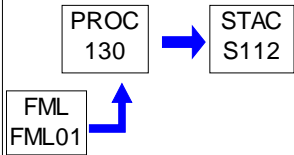
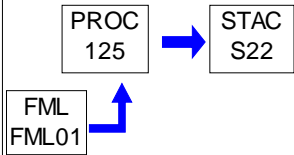
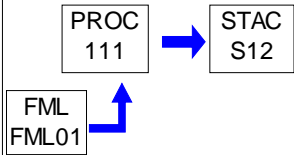
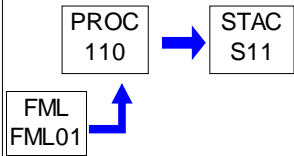
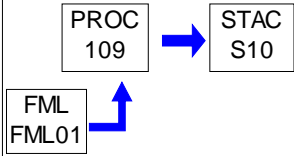
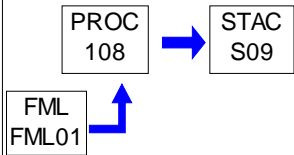
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
106	FLEXO PRESS CI-8 WITH DRYER	N/A	SOLVENT IN INK
		800.000 CF/HR	NATURAL GAS
107	FLEXO PRESS CI-9 WITH DRYER	N/A	SOLVENT IN INK
		1,600.000 CF/HR	NATURAL GAS
108	FLEXO PRESS CI-10 WITH DRYER	N/A	SOLVENT IN INK
		1,200.000 CF/HR	NATURAL GAS
109	FLEXO PRESS CI-11 WITH DRYER	N/A	SOLVENT IN INK
		2,400.000 CF/HR	NATURAL GAS
110	FLEXO PRESS CI-12 WITH DRYER	N/A	SOLVENT IN INK
		1,200.000 CF/HR	NATURAL GAS
111	FLEXO PRESS CI-14 WITH DRYER	N/A	SOLVENT IN INK
		1,800.000 CF/HR	NATURAL GAS
125	SPACE HEATERS	N/A	Natural Gas
130	FLEXO PRESS CI-15 WITH 2 DRYERS	N/A	SOLVENT IN INK
		2,280.000 CF/HR	NATURAL GAS
131	MISCELLANEOUS VOC SOURCES		
132	FLEXOGRAPHIC PRINTING PRESS CI-16	N/A	SOLVENT IN INK
700	125-KW GAS FIRED EMERGENCY GENERATOR		
FML01	NATURAL GAS		
S07	CI-8 STACK		
S08	CI-9 STACK		
S09	CI-10 STACK		
S10	CI-11 STACK		
S11	CI-12 STACK		
S112	CI-15 STACK		
S116	CI-16 STACK		
S12	CI-14 STACK		
S131	VARIOUS		
S22	STACK FOR SPACE HEATERS		
S700	EMERGENCY GENERATOR STACK		

PERMIT MAPS



PERMIT MAPS



**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 act.

#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 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

**SECTION B. General Title V Requirements**

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.

#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.

**SECTION B. General Title V Requirements****#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.

#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].

**SECTION B. General Title V Requirements****#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.

#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.

**SECTION B. General Title V Requirements**

(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 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.

**SECTION B. General Title V Requirements**

(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.

(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

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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 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

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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.

#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.

**SECTION B. General Title V Requirements****#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:
 - (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.

**SECTION B. General Title V Requirements**

(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.

(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.**

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

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

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

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations, as specified in 25 Pa. Code § 129.14.
- (7) Sources and classes of sources other than those identified in (1)-(6) , above, for which the permittee has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

- (i) The emissions are of minor significance with respect to causing air pollution; and
- (ii) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

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

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

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

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

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

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

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

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

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

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

**SECTION C. Site Level Requirements****# 007 [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; or
- (g) a fire set solely for cooking food.

008 Elective Restriction

[Authority for this permit condition is derived from 25 Pa. Code § 127.512 and 40 CFR § 63.820]

- (a) The Hazardous Air Pollutants (HAPs) emissions of this facility shall not exceed the following:
 - (1) 10 tons per year of each HAP on a 12-month rolling period at the facility, including materials used for source categories or purposes other than printing and publishing, and
 - (2) 25 tons per year of any combination of HAP on a rolling 12-month period at the facility, including materials used for source categories or purposes other than printing and publishing.
- (b) Exceedences of sub-condition (a) of this permit condition will result in the facility being subjected to 40 CFR § 63 subpart KK: National Emission Standards for the Printing and Publishing Industry.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512]

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139 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.

**SECTION C. Site Level Requirements****III. MONITORING REQUIREMENTS.****# 010 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

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

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

[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); and
 - (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); and
 - (4) be recorded in a permanent written log.
- (c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly for the next six month period.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification (if applicable), complaints, monitoring results, and/or Department findings.

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

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

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

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

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

The permittee shall 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.

**SECTION C. Site Level Requirements****# 014 [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.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.35(b)]

The permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with the HAP limit for an area source (facility), including the mass of all HAP containing materials used at the facility and the mass fraction of HAP present in each HAP containing material used at the facility, on a monthly basis, pursuant to 40 CFR § 63.829(d).

V. REPORTING REQUIREMENTS.**# 015 [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 report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

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

(c) The report shall describe the following:

- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.

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

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

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

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

**SECTION C. Site Level Requirements****# 016 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

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 #24 of section B of this permit. . The annual certificate of compliance shall be submitted to the Department in paper form, and EPA Region III in electronic form at the following email address: R3_APD_Permits@epa.gov
- (b) A semi-annual deviation report, 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).

017 [25 Pa. Code §135.3]**Reporting**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

If the permittee has been previously advised by the Department to submit a source report, the permittee shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from all 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, including those sources listed in the Miscellaneous Section of this permit.

The permittee may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

VI. WORK PRACTICE REQUIREMENTS.**# 018 [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.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]

The permittee shall immediately implement measures, which may include the application for a Plan Approval for the installation of air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A, of this permit, is causing the emission of air 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****# 020 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

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.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h)]

The permittee shall operate and maintain all sources and air cleaning devices at the facility in a manner consistent with good operating and maintenance practices, and in accordance with available manufacturer's specifications.

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

The permittee shall reduce emissions of Class I and Class II refrigerants during the service, maintenance, repair, and disposal of equipment in accordance with the requirements of 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

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: 106

Source Name: FLEXO PRESS CI-8 WITH DRYER

Source Capacity/Throughput:

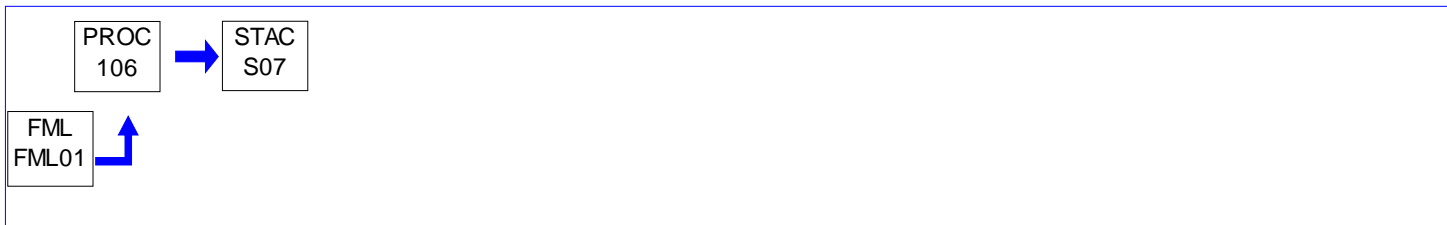
N/A

SOLVENT IN INK

800.000 CF/HR

NATURAL GAS

Conditions for this source occur in the following groups: GROUP #1
GROUP 3
GROUP 4

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §129.67]

The permittee shall operate and maintain the source in such a manner as not to exceed the VOC emission limit of 6 tons per year on a 12 month rolling basis.

[Compliance with this condition demonstrates compliance with the potential VOC limit pursuant to 25 Pa. Code §129.67a(c)(4)]

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67(b)(1)]

The permittee shall limit the volatile fraction of the ink, as applied to the substrate, to contain 25% or less by volume of VOC and 75% or more by volume of water. The volatile fraction of the ink consists of the non-solids fraction and includes any VOCs, water, and exempt solvents.

II. TESTING REQUIREMENTS.

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



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) 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 (Title V 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

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

**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: FLEXO PRESS CI-9 WITH DRYER

Source Capacity/Throughput:

N/A

SOLVENT IN INK

1,600.000 CF/HR

NATURAL GAS

Conditions for this source occur in the following groups: GROUP #1
 GROUP 2
 GROUP 4

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67(b)(1)]

The permittee shall limit the volatile fraction of ink, as applied to the substrate, to contain 25% or less by volume of VOC and 75% or more by volume of water. The volatile fraction of ink consists of the non-solids fraction and includes any VOCs, water, and exempt solvents.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §129.67]

The permittee shall operate and maintain the source in such a manner as not to exceed the VOC emission limit of 12 tons per year on a 12 month rolling basis.

[Compliance with this condition demonstrates compliance with the potential VOC limit pursuant to 25 Pa. Code §129.67a(c)(4)]

II. TESTING REQUIREMENTS.

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



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) 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 (Title V 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

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

**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: FLEXO PRESS CI-10 WITH DRYER

Source Capacity/Throughput:

N/A

SOLVENT IN INK

1,200.000 CF/HR

NATURAL GAS

Conditions for this source occur in the following groups: GROUP #1
GROUP 2
GROUP 4

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §129.67]

The permittee shall operate and maintain the source in such a manner as not to exceed the VOC emission limit of 8 tons per year on a 12 month rolling basis.

[Compliance with this condition demonstrates compliance with the potential VOC limit pursuant to 25 Pa. Code §129.67a(c)(4)]

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67(b)(1)]

The permittee shall limit the volatile fraction of the ink, as applied to the substrate, to contain 25% or less by volume of VOC and 75% or more by volume of water. The volatile fraction of the ink consists of the non-solids fraction and includes any VOCs, water, and exempt solvents.

II. TESTING REQUIREMENTS.

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



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) 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 (Title V 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

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

**SECTION D. Source Level Requirements**

Source ID: 109

Source Name: FLEXO PRESS CI-11 WITH DRYER

Source Capacity/Throughput:

N/A

SOLVENT IN INK

2,400.000 CF/HR

NATURAL GAS

Conditions for this source occur in the following groups: GROUP #1
 GROUP 3
 GROUP 4

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67(b)(1)]

The permittee shall limit the volatile fraction of the ink, as applied to the substrate, to contain 25% or less by volume of VOC and 75% or more by volume of water. The volatile fraction of the ink consists of the non-solids fraction and includes any VOCs, water, and exempt solvents.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67]

The permittee shall operate and maintain the source in such a manner as not to exceed the VOC emission limit of 12 tons per year on a 12 month rolling basis.

[Compliance with this condition demonstrates compliance with the potential VOC limit pursuant to 25 Pa. Code §129.67a(c)(4)]

II. TESTING REQUIREMENTS.

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



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) 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 (Title V 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

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

**SECTION D. Source Level Requirements**

Source ID: 110

Source Name: FLEXO PRESS CI-12 WITH DRYER

Source Capacity/Throughput:

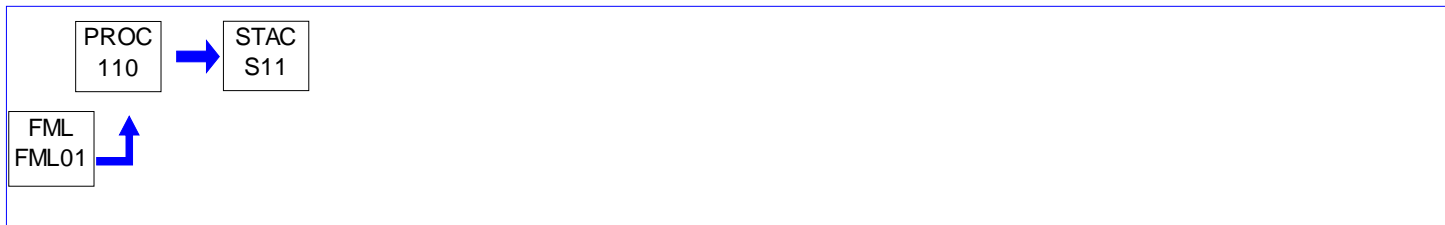
N/A

SOLVENT IN INK

1,200.000 CF/HR

NATURAL GAS

Conditions for this source occur in the following groups: GROUP #1
GROUP 2
GROUP 4

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67(b)(1)]

The permittee shall limit the volatile fraction of the ink, as applied to the substrate, to contain 25% or less by volume of VOC and 75% or more by volume of water. The volatile fraction of the ink consists of the non-solids fraction and includes any VOCs, water, and exempt solvents.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67]

The permittee shall operate and maintain the source in such a manner as not to exceed the VOC emission limit of 10 pounds per hour and 10 tons per year on a 12 month rolling basis.

[Compliance with this condition demonstrates compliance with the potential VOC limit pursuant to 25 Pa. Code §129.67a(c)(4)]

II. TESTING REQUIREMENTS.

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



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) 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 (Title V 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

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

**SECTION D. Source Level Requirements**

Source ID: 111

Source Name: FLEXO PRESS CI-14 WITH DRYER

Source Capacity/Throughput:

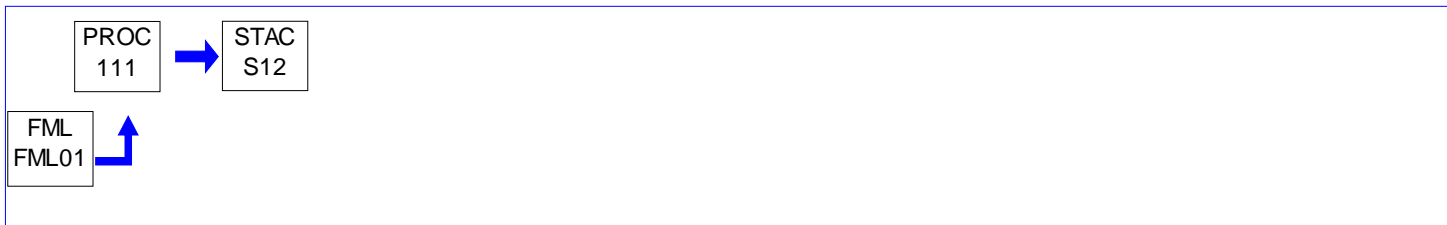
N/A

SOLVENT IN INK

1,800.000 CF/HR

NATURAL GAS

Conditions for this source occur in the following groups: GROUP #1
 GROUP 2
 GROUP 4

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67]

The permittee shall operate and maintain the source in such a manner as not to exceed the VOC emission limit of 10 pounds per hour and 10 tons per year on a 12 month rolling basis.

[Compliance with this condition demonstrates compliance with the potential VOC limit pursuant to 25 Pa. Code §129.67a(c)(4)]

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.67(b)(1)]

The permittee shall limit the volatile fraction of the ink, as applied to the substrate, to contain 25% or less by volume of VOC and 75% or more by volume of water. The volatile fraction of the ink consists of the non-solids fraction and includes any VOCs, water, and exempt solvents.

II. TESTING REQUIREMENTS.

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

**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) 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 (Title V 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 (Title V General Requirements) and/or Section E (Source Group Restrictions).

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

**SECTION D. Source Level Requirements**

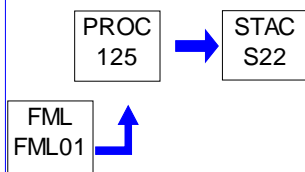
Source ID: 125

Source Name: SPACE HEATERS

Source Capacity/Throughput:

N/A

Natural Gas

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

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

002 [25 Pa. Code §123.21]**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

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

[Additional Authority for this permit condition is also derived from 25 Pa. Code § 129.91]

The VOC emissions for this source shall not exceed 3 pounds per hour, 15 pounds per day, or 2.7 tons per 12-month rolling period.

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

The permittee shall use only Natural Gas for the Space Heaters in Source ID #125.

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

The permittee shall monitor the amount and type of fuel consumed by this source on a monthly basis.

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

The permittee shall maintain monthly records of the amount and type of fuel consumed by this source, including 12-month rolling sums.

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

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511 and 129.91]

The permittee shall maintain records to demonstrate to the Department that the units contained in this Source ID comply with VOC limits specified in Condition #003.

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.**# 008 [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]

The permittee shall operate and maintain the sources in accordance with available manufacturers' specifications.

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: 130

Source Name: FLEXO PRESS CI-15 WITH 2 DRYERS

Source Capacity/Throughput:

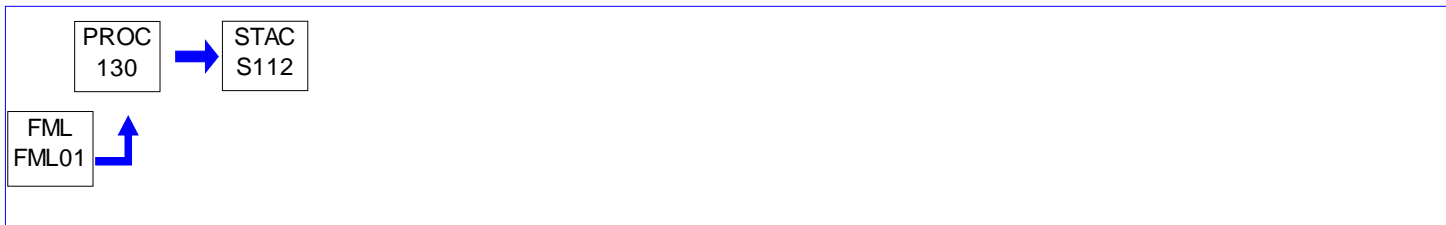
N/A

SOLVENT IN INK

2,280.000 CF/HR

NATURAL GAS

Conditions for this source occur in the following groups: GROUP #1
 GROUP 2
 GROUP 4

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

The permittee shall limit the volatile fraction of the ink, as applied to the substrate, to contain 23% or less by volume of VOC and 77% or more by volume of water or exempt (non-VOC) solvent. The volatile fraction of the ink consists of the non-solids fraction and includes any VOCs, water, and exempt solvents.

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

The permittee shall limit the total VOC emissions, including any hazardous air pollutants which are VOC, from the source to the maximum of 7.0 pounds per hour, 150 pounds per day, and 12.0 tons per year, as a 12-month rolling sum calculated monthly. These limits shall include emissions of VOCs used in clean-up operations.

[Compliance with this condition demonstrates compliance with the potential VOC limit pursuant to 25 Pa. Code §129.67a(c)(4)]

II. TESTING REQUIREMENTS.

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

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

The permittee shall exclusively use low VOC water-based inks and/or ultra-violet light-curable inks on press CI-15. The water-based inks shall be used in conjunction with enclosed doctor blade units.

VII. ADDITIONAL REQUIREMENTS.

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

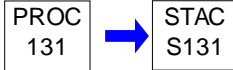
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 131

Source Name: MISCELLANEOUS VOC SOURCES

Source Capacity/Throughput:

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

[Additional authority for this permit condition is also derived from 25 Pa. Code § 129.92]

The Volatile Organic Compounds (VOC) emissions for each source listed in Condition #004 shall not exceed 3 pounds per hour, 15 pounds per day, or 2.7 tons per year on a twelve (12) month rolling basis.

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.**

[Additional authority for this permit condition is also derived from 25 Pa. Code §§ 127.511 and 129.91]

The permittee shall maintain records to demonstrate to the Department that the sources listed under Condition #004 comply with VOC limits specified in Condition #001.

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

The operation and maintenance of the sources listed in Condition #004 of this Section of the permit shall be in accordance with manufacturers' specifications, if available, and good air pollution control practices.

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

Source 131 - Miscellaneous Sources consists of the following:

(1) Waste Storage Area

**SECTION D. Source Level Requirements**

- (2) Cowles Mixer (55 gallon)
- (3) Two (2) Air Mixers
- (4) Ultrasonic Roll Cleaner
- (5) Hot Air Furnace in MAACO Building
- (6) Boiler in Manufacturing Building
- (7) Water Heater
- (8) MAACO Building Loading Dock Boiler
- (9) Manufacturing Building Loading Dock Boiler
- (10) Plate Mounting Area
- (11) Solvent Distribution Area.
- (12) Cyrel Light Finisher.

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

**SECTION D. Source Level Requirements**

Source ID: 132

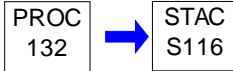
Source Name: FLEXOGRAPHIC PRINTING PRESS CI-16

Source Capacity/Throughput:

N/A

SOLVENT IN INK

Conditions for this source occur in the following groups: GROUP 4

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

The permittee shall limit VOC emissions from the press (including clean-up operations) to 4.2 pounds per hour and 6.0 tons per year based on a 12-month rolling sum.

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

The permittee shall limit the volatile fraction of the inks, as applied to the substrate, to 25% or less by volume of VOC and 75% or more by volume of water.

[This condition assures compliance with 25 Pa. Code § 129.67(b)(1) and 25 Pa. Code § 127.12(a)(5).]

003 [25 Pa. Code §129.67a]**Control of VOC emissions from flexible packaging printing presses.**

Work practice requirements for cleaning activities.

(1) Except as specified in paragraph (3), beginning January 1, 2015, the permittee shall comply with the following work practices for cleaning activities at the facility:

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

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

(iii) Minimize spills of VOC-containing cleaning solutions and waste cleaning solutions and clean up spills immediately.

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

(2) The requirements in paragraph (1) apply to the following activities:

(i) Cleaning of ink, coating or adhesive from a press.

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

(iii) Cleaning of ink, coating or adhesive from areas around a press.

(3) The requirements in paragraph (1) do not apply to the following activities:

(i) Cleaning electronic components of a press.

(ii) Cleaning in pre-press (for example, platemaking) operations.

**SECTION D. Source Level Requirements**

- (iii) Cleaning in post-press (for example, binding) operations.
- (iv) Using janitorial supplies (for example, detergents or floor cleaners) for general cleaning around a press.

II. TESTING REQUIREMENTS.

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

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

The permittee shall monitor the following information for this press, per job:

- (a) ink usage in gallons, and pounds, as applied.
- (b) ink composition:
 - (1) ink identification number,
 - (2) percent solids by volume,
 - (3) percent solvent by volume,
 - (4) percent water by volume,
 - (5) pounds of VOC per gallon minus water,
 - (6) solvent density,
 - (7) percent exempt solvent by volume.
- (c) daily clean-up solvents usage (quantity), and its VOC content and solvent density.
- (d) the hours of operation of each press, per job.

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

- (a) The permittee shall monitor the mass of HAP-containing materials used on a monthly basis.
- (b) The permittee shall monitor the mass fraction of each HAP in the HAP-containing materials used on a monthly basis.

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

- (a) The permittee shall maintain monthly records of the mass of HAP-containing materials used on this press.
- (b) The permittee shall maintain monthly records of the mass fraction of each HAP in the HAP-containing materials used on this press.
- (c) The permittee shall maintain monthly records of HAP emissions for this source, including a 12-month rolling sum.

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

- (a) The permittee shall maintain records of the following for this press per job:
 - (1) ink usage (gallons and pounds),
 - (2) clean-up solvent usage,
 - (3) hours of operation,

**SECTION D. Source Level Requirements**

(4) VOC emissions (lb/hr and 12-month rolling sums).

(b) The permittee shall maintain records of manufacturer specifications for this press.

(c) The permittee shall maintain records of training manuals and any training conducted for operation of this press.

(d) The permittee shall maintain records all ink testing conducted for this press.

(e) The permittee shall maintain records of all CPDS and/or SDS for inks used on this press.

[Compliance with this condition demonstrates compliance with the record keeping requirement of 25 Pa. Code §129.67a(e)(3)]

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall conduct the following good work practice standards for the cleaning of on-press parts, work areas, tools, and other equipment:

(a) Virgin and waste solvents shall be stored in covered containers

(b) The cover of the solvent containers shall be closed after the rag/applicator has been dipped in the solvent.

(c) Used rags/applicators shall be stored in closed containers after use.

(d) Spillage and splashing during the transfer of solvent from containers shall be minimized by all practical means.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall train the press operators on the proper work practice standards.

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall operate and maintain this flexographic printing press according to the manufacturer's specifications and good air pollution control practices.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall exclusively use low VOC water-based inks and/or ultra-violet light-curable inks for this press. The water-based inks shall be used in conjunction with enclosed doctor blade units.

VII. ADDITIONAL REQUIREMENTS.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This press is equipped with an electric drying system.

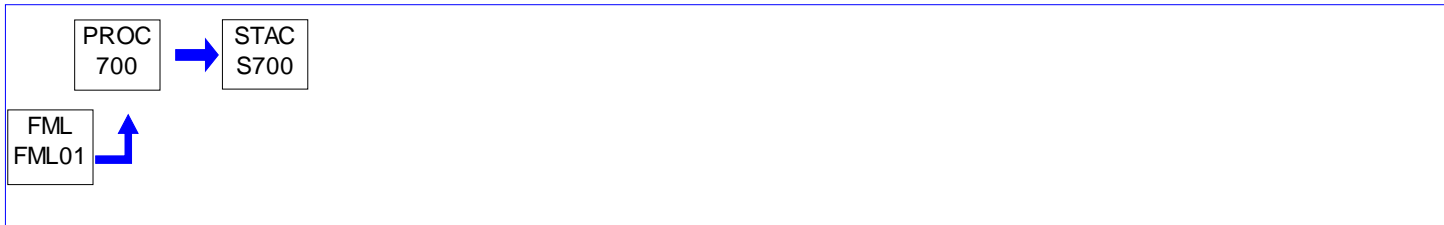
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 700

Source Name: 125-KW GAS FIRED EMERGENCY GENERATOR

Source Capacity/Throughput:

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

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from any source in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from any source group in a manner that the concentration of the sulfur oxides, expressed as SO₂, in the effluent gas exceeds 500 ppmvd.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The combined emissions of nitrogen oxides (NO_x) from all exempt emergency generators shall be limited to 100 pounds per hour, 1,000 pounds per day, 2.75 tons per ozone season, and 6.6 tons per year on a 12- month rolling basis.

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 hours of operation for the emergency generator on a monthly basis and as a 12-month rolling sum, when operating.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) The permittee shall maintain records of the hours of operation for the emergency generators on a monthly basis and as a 12-month rolling sum.

(b) For each emergency generator, the permittee must specify the category of operation, such as "emergency", "nonemergency" and "maintenance and testing" and the amount of time the unit was used for each category or operation.

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.**

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

VII. ADDITIONAL REQUIREMENTS.

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

a) Owners or operators of stationary SI ICE must keep records of the following information:

(1) All maintenance conducted on the engine.

(2) If the stationary SI ICE is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

(3) If the stationary SI ICE is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

(b) For all stationary emergency SI ICE greater than or equal to 130 HP and less than 500 HP manufactured on or after July 1, 2011 that do not meet the standards applicable to non-emergency engines, the owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. For all stationary emergency SI ICE greater than 25 HP and less than 130 HP manufactured on or after July 1, 2008, that do not meet the standards applicable to non-emergency engines, the owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for nonemergency operation.

**# 007 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4245]
Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?**

The owner or operator of an emergency stationary SI ICE with a maximum engine power more than 100 HP (75 kW) that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §60.4243(d)(2)(ii) and (iii) or that operates for the purposes specified in §60.4242(d)(3)(i), must submit an annual report according to the requirements in paragraphs (1) through (3).

(1) The report must contain the following information:

(i) Company name and address where the engine is located.

(ii) Date of the report and beginning and ending dates of the reporting period.

(iii) Engine site rating and model year.

(iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.

(v) Hours operated for the purposes specified in §60.4243(d)(2)(ii) and (iii), including the date, start time, and end time forengine operation for the purposes specified in §60.4243(d)(2)(ii) and (iii).

(vi) Number of hours the engine is contractually obligated to be available for the purposes specified in §60.4243(d)(2)(ii) and (iii).

(vii) Hours spent for operation for the purposes specified in §60.4243(d)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in §60.4243(d)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

(2) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.



SECTION D. Source Level Requirements

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

**SECTION E. Source Group Restrictions.**

Group Name: GROUP #1

Group Description: FLEXOGRAPHIC PRINTING PRESSES

Sources included in this group

ID	Name
106	FLEXO PRESS CI-8 WITH DRYER
107	FLEXO PRESS CI-9 WITH DRYER
108	FLEXO PRESS CI-10 WITH DRYER
109	FLEXO PRESS CI-11 WITH DRYER
110	FLEXO PRESS CI-12 WITH DRYER
111	FLEXO PRESS CI-14 WITH DRYER
130	FLEXO PRESS CI-15 WITH 2 DRYERS

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.**# 001 [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 and 129.67]

The permittee shall monitor the following information, for each flexographic press, per job, per average hour:

- (1) Daily ink in gallons, and pounds, as applied,
- (2) The ink composition:
 - A. Percent solids by volume
 - B. Percent solvent by volume
 - C. Percent water by volume
 - D. Pounds of VOC per gallon minus water
 - E. Solvent density
 - F. Percent exempt solvent by volume
- (3) Daily clean-up solvents usage (quantity), and its VOC content and solvent density.
- (4) The hours of operation of each press, per job.

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

The permittee shall monitor the amount and type of fuel consumed by the dryer(s) associated with this press, using a Department approved method.

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

The permittee shall maintain records of the following for this press:

- (1) all testing and monitoring conducted
- (2) manufacturer's specifications
- (3) training manuals and any training conducted for operation of this press.
- (4) hours of operation

**SECTION E. Source Group Restrictions.**

(5) VOC emissions, including 12-month rolling sums.

[Compliance with this condition demonstrates compliance with the record keeping requirement of 25 Pa. Code §129.67a(e)(3)]

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

The permittee shall maintain monthly records of the amount and type of fuel consumed by the dryer(s) associated with this press, using a Department approved method.

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.**

The permittee shall conduct the following good work practice standards for the cleaning of on-press parts, work areas, tools, and other equipment:

- (1) Virgin and waste solvents shall be stored in covered containers
- (2) The cover of the solvent containers shall be closed after the rag/applicator has been dipped in the solvent
- (3) Used rags/applicators shall be stored in closed containers after use
- (4) Spillage and splashing during the transfer of solvent from containers shall be minimized by all practical means.

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

The permittee shall train the press operators on the proper work practice standards.

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

The permittee shall operate and maintain each flexographic printing press and each dryer section of the press according to the manufacturer's specifications and good air pollution control practices.

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

The permittee shall exclusively use low VOC water-based inks and/or ultra-violet light-curable inks for this press. The water-based inks shall be used in conjunction with enclosed doctor blade units.

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

Work practice requirements for cleaning activities.

(1) Except as specified in paragraph (3), beginning January 1, 2015, the permittee shall comply with the following work practices for cleaning activities at the facility:

- (i) Store all VOC-containing cleaning solutions, waste cleaning solutions and used shop towels in closed containers.
- (ii) Ensure that mixing vessels and storage containers used for VOC-containing cleaning solutions, waste cleaning solutions and used shop towels are kept closed at all times, except when depositing or removing these solutions or shop towels.
- (iii) Minimize spills of VOC-containing cleaning solutions and waste cleaning solutions and clean up spills immediately.

**SECTION E. Source Group Restrictions.**

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

(2) The requirements in paragraph (1) apply to the following activities:

- (i) Cleaning of ink, coating or adhesive from a press.
- (ii) Cleaning of ink, coating or adhesive from press parts, including press parts that have been removed from the press for cleaning.
- (iii) Cleaning of ink, coating or adhesive from areas around a press.

(3) The requirements in paragraph (1) do not apply to the following activities:

- (i) Cleaning electronic components of a press.
- (ii) Cleaning in pre-press (for example, platemaking) operations.
- (iii) Cleaning in post-press (for example, binding) operations.
- (iv) Using janitorial supplies (for example, detergents or floor cleaners) for general cleaning around a press.

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 E. Source Group Restrictions.**

Group Name: GROUP 2

Group Description: presses with natural gas only dryers

Sources included in this group

ID	Name
107	FLEXO PRESS CI-9 WITH DRYER
108	FLEXO PRESS CI-10 WITH DRYER
110	FLEXO PRESS CI-12 WITH DRYER
111	FLEXO PRESS CI-14 WITH DRYER
130	FLEXO PRESS CI-15 WITH 2 DRYERS

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall burn natural gas only in the dryer(s) associated with this press.

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.

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

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

VII. ADDITIONAL REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This press is equipped with natural gas dryers.

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

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 3

Group Description: presses with natural gas and electric dryers

Sources included in this group

ID	Name
106	FLEXO PRESS CI-8 WITH DRYER
109	FLEXO PRESS CI-11 WITH DRYER

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall burn natural gas only in the non-electric dryers associated with this press.

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.

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

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

VII. ADDITIONAL REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This press is equipped with natural gas dryers.

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

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 4

Group Description: Testing Requirement

Sources included in this group

ID	Name
106	FLEXO PRESS CI-8 WITH DRYER
107	FLEXO PRESS CI-9 WITH DRYER
108	FLEXO PRESS CI-10 WITH DRYER
109	FLEXO PRESS CI-11 WITH DRYER
110	FLEXO PRESS CI-12 WITH DRYER
111	FLEXO PRESS CI-14 WITH DRYER
130	FLEXO PRESS CI-15 WITH 2 DRYERS
132	FLEXOGRAPHIC PRINTING PRESS CI-16

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.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall use data from Certified Product Data Sheets (CPDS), Safety Data Sheets (SDS), or Technical Data Sheets (TDS) to calculate the emissions of the Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) from this source.

(b) The permittee, as an alternative to the CPDS, SDS, and TDS may use USEPA Method 24 (or any subsequent USEPA approved method) to determine the VOC and HAP content of the inks.

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.

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

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

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 F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

Source Id	Source Descriptor	Emission Limit	Pollutant
106	FLEXO PRESS CI-8 WITH DRYER	6.000 Tons/Yr	VOC
107	FLEXO PRESS CI-9 WITH DRYER	12.000 Tons/Yr	VOC
108	FLEXO PRESS CI-10 WITH DRYER	8.000 Tons/Yr	VOC
109	FLEXO PRESS CI-11 WITH DRYER	12.000 Tons/Yr	VOC
110	FLEXO PRESS CI-12 WITH DRYER	10.000 Lbs/Hr	VOC
		10.000 Tons/Yr	VOC
111	FLEXO PRESS CI-14 WITH DRYER	10.000 Lbs/Hr	VOC
		10.000 Tons/Yr	VOC
125	SPACE HEATERS	0.040 gr/DRY FT3	PM10
		500.000 PPMV	SOX
		2.700 Tons/Yr	VOC
		3.000 Lbs/Hr	VOC
		15.000 Lbs/Day	VOC
130	FLEXO PRESS CI-15 WITH 2 DRYERS	7.000 Lbs/Hr	VOC
		12.000 Tons/Yr	VOC
		150.000 Lbs/Day	VOC
131	MISCELLANEOUS VOC SOURCES	2.700 Tons/Yr	VOC
		3.000 Lbs/Hr	VOC
		15.000 Lbs/Day	VOC

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description
132	FLEXOGRAPHIC PRINTING PRESS CI-16

Emission Limit	Pollutant
4.200 Lbs/Hr	VOC
6.000 Tons/Yr	VOC

Site Emission Restriction Summary

Emission Limit		Pollutant
24.900 Tons/Yr	any combination of HAPs	Hazardous Air Pollutants
9.900 Tons/Yr	single HAPs	Hazardous Air Pollutants

**SECTION H. Miscellaneous.**

- (a) March 2001 - AUTH ID 355460: The previously issued Operating Permit, OP-09-0003, serves as the basis for certain terms and conditions set forth in this Title V Permit. OP-09-0003 is the VOC RACT Permit for six (6) Flexographic printing presses CI-8, 9, 10, 11, 12, and CI-14 at the graphic arts facility.
- (b) The following sources have been determined by the Department to be insignificant sources of air emissions, (Potential to Emit Regulated Air Pollutants is less than 1 ton per year), and therefore do not require additional limitations, monitoring, or recordkeeping. They are still subject to any applicable Federal, State, and Local Regulations that may apply, including Site Level Requirements of this Title V Operating Permit.
- (1) 220 Ton Carrier Chiller Unit
 - (2) 100 Ton Carrier Chiller Unit
 - (3) Masking and Ablating Laser at the Plate Mounting Area (RFD No. 09-A01-987)
 - (4) Thermal Processor for stripping away plate material at the Plate Mounting Area (RFD No. 09-A01-987)
 - (5) Micromedia Anilox Roller Cleaner
 - (6) Micro Clean Blast media Parts Cleaning System.
- (c) In December 2000, the permittee entered into an agreement to sell all of its VOC emission reduction credits (ERCs) totaling 26.9 tons per year. These ERCs were generated by the permanent shutdown and subsequent removal of five presses. In addition, in March 2001, a portion of the ERCs (13.82 tons per year) were transferred into a plan approval to prevent the expiration of the ERCs. The sources that were removed are as follows:
- (1) Stack Press Kidder-Machine #4464, removed 11/23/92
 - (2) CI-3 Kidder-Machine #4629, removed 3/29/91
 - (3) CI-4 Kidder-Machine #944-444, removed 1/8/93
 - (4) CI-7 Paper Converting #6088, removed 9/30/93
 - (5) Mark Andy #5681, removed 11/15/91.
- (d) Previously, fugitive particulate matter emissions from the flexographic printing presses were controlled by baghouses. The company had determined that the grain in-loading of the baghouses was below the exemption level. However, the baghouses are no longer in use; in their place, simple vacuums are now being used. If the baghouses are to be used at any point in the future, the company must obtain permission from the Department.
- (e) August 2002 - AUTH ID 378131: This permit is an administrative amendment to incorporate terms and conditions from Plan Approval 09-320-050 for the flexographic printing press CI-15 (Source ID 130).
- (f) May 2006 - AUTH ID 605324: This Title V Permit is a Renewal. Sources are not subjected to CAM and there are no new significant sources at this facility. There are no new state or federal regulations which apply to this facility. APS ID 346654; AUTH ID 605324.
- (g) January 2010 - AUTH ID 815968: This permit is an administrative amendment to incorporate terms and conditions from Plan Approval No. 09-0003B for the flexographic printing press CI-16 (Source ID 132).
- (h) April 2011 - AUTH ID 852419: This permit is the RENEWAL permit. There are no new state or federal regulations applicable to the facility with this renewal permit. There are no new significant sources of emissions. Micro Clean Blast Media Parts Cleaning System has been added at the facility and appears as an insignificant source of emissions in (b)(6) above. The Vilter Chiller Unit and the Simple Green Parts Washer have been removed from the facility and no longer appear in (b) above. The Source Level Testing Requirement for all flexographic presses has been updated to the current version of the condition as it appeared previously for the newest press, Source ID 132. A map diagram has been added to Source ID 131 to indicate the various exhaust points for the units operating as part of "Miscellaneous VOC Sources." Natural Gas Fuel Material Location (FML01) has been added to the source maps, as applicable.
- (i) April 2016 - AUTH ID 1072789: This permit is the RENEWAL permit. Weekly monitoring was changed to monthly monitoring per letter dated July 27, 2016 for Section C, condition #011 (Daily monitoring had been changed to weekly monitoring per letter dated April 28, 2015)
- (j) AUTH ID 1365323: Renewal of TVOP. No new sources. For clarification on previous changes: Source 107, CI-9 added two print stations, making it an 8-color press (PA 09-0003) . Source 110, CI-12 added a new press section that has rapid changeover capability (applicaton withdrawn letter - December 16, 2010). The ultrasonic roll cleaner (under source 131) now uses a non VOC cleaner.



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