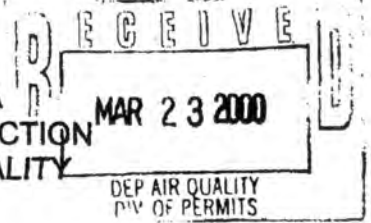


COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - BUREAU OF AIR QUALITY



OPERATING PERMIT
(Revised)

March 15, 2000

In accordance with provisions of the Air Pollution Control Act, the act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below:

| | | | |
|-------------------|--------------------------------------|------------------|------------------------------------|
| Permit No. | <u>OP-46-0012</u> | Source(s) | <u>Facility VOC & NOX RACT</u> |
| Owner | <u>Philadelphia Newspapers, Inc.</u> | Air | <u></u> |
| Address | <u>800 River Road</u> | Cleaning | <u></u> |
| | <u>Conshohocken, PA 19428-2652</u> | Device | <u></u> |
| Attention | <u>Michelle E. Fryman</u> | Location | <u>800 River Road</u> |
| | <u>Environmental Affairs Manager</u> | | <u>Upper Merion Township</u> |
| | | | <u>Montgomery County</u> |

This permit is subject to the following conditions:

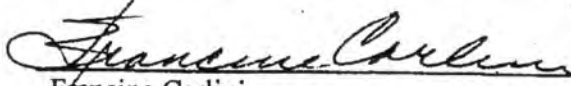
1. That the source(s) and any associated air cleaning devices are to be:
 - a. operated in such a manner as not to cause air pollution;
 - b. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

(SEE ADDITIONAL CONDITIONS ATTACHED)

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued August 30, 1996

Expires August 30, 2001


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re 30 (RN00)67-10

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0012
PHILADELPHIA NEWSPAPERS, INC.
(Revised)

March 15, 2000

CONDITIONS (continued):

3. This Reasonably Available Control Technology (RACT) Operating Permit is issued to Philadelphia Newspaper, Inc. (PNI) for the operation of their sources located at Upper Merion Township, Montgomery County. This Operating Permit is the Department's determination of RACT for Volatile Organic Compound (VOC) emission sources and requires PNI to remain as a minor source of Nitrogen Oxides (NOx).

4. Emission Limitations

- A. For sources regulated under 25 Pa Code Section 129.61 and Section 129.82:

This underground gasoline storage tank is equipped with Stage I and Stage II which meets 25 Pa. Code Section 129.61 and Section 129.82. PNI shall limit the VOC emissions from the underground gasoline storage tank to 3.70 tons per year (12-month rolling sum).

- B. Sources regulated under 25 Pa. Code Section 129.91-95: PNI shall limit the VOC emissions from the source categories listed below to the following limitations:

| <u>Sources Name</u> | <u>Allowable VOC Emissions</u> <u>(tons/year)*</u> |
|-------------------------------------|---|
| Presses A, B, C, D, E F, G, H and I | 23.00 |
| Platemaking Developer | 8.5 |
| * 12-month rolling sum | |

- C. RACT is determined for the sources as follows:

Printing Presses:

- Use of news inks with less than 15% VOC
- Use of blanket wash with less than 30% VOC
- Use of fountain solution with alcohol substitutes in the quantities recommended by the manufacturer.

Platemaking Developer:

- Use of Platemaking Developer photochemistries with less than 15% VOC content.

- D. The following de minimis source categories shall be operated with VOC emission rates of no greater than 3 pounds per hour, 15 pounds per day and 2.7 tons per year (12-month rolling sum) whichever is more stringent.

**OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0012
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(Revised)**

CONDITIONS (continued):

Source Name

1. Miscellaneous fugitive emissions from photo development and platemaking
2. Miscellaneous fugitive emissions from maintenance and utility areas
3. Miscellaneous fugitive emissions from janitorial supplies
4. Mail room

OPERATING PERMIT CONDITIONS
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PHILADELPHIA NEWSPAPERS, INC.
(Revised)

CONDITIONS (continued):

5. A. The following sources of NOx shall have the operating schedule given below:

| Source Name | Manufacturer and Model No. | Rated Capacity MMBtu/hr | Operating Schedule Hours/yr. |
|----------------------------|-----------------------------|-------------------------|------------------------------|
| MB Hot Water Boiler 1 | Cleaver Brooks CB-3000 | 10.056 | 5040 |
| MB Hot Water Boiler 2 | Cleaver Brooks CB-3000 | 10.056 | 5040 |
| MB Hot Water Boiler 3 | Cleaver Brooks CB-3000 | 10.056 | 5040 |
| MB Steam Boiler 1 | Cleaver Brooks | 13.408 | 5040 |
| MB Hot Water Heater 1 | PVI 1000P2000ATP | 0.800 | 8760 |
| MB Hot Water Heater 2 | PVI 1000P2000ATP | 0.800 | 8760 |
| MB Hot Water Heater 3 | PVI 1500p400ATP | 1.200 | 8760 |
| VMF Hot Water Boiler 4 | Heat Maker CB-200NAT | 0.180 | 5040 |
| VMF Hot Water Boiler 5 | Heat Maker CB-200NAT | 0.180 | 5040 |
| VMF Hot Water Boiler 3 | PVI 27P250AG | 0.270 | 8760 |
| Garage Space Heaters 2 (8) | Perfection Shwank | 0.100 each | 5040 |
| PH Hot Water Boiler 4 | Cleaver Brooks CB-700-30 | 0.180 | 5040 |
| PH Space Heater 3 | Trane | 0.100 | 5040 |

MB = Main Building; VMF = Vehicle Maintenance Facility; PH = Pump House

- B. Only natural gas shall be used as fuel for all the combustion units/sources at the facility.
- C. A meter will be placed on the main natural gas line to the plant and records of fuel use shall be logged on a daily and monthly basis.

OPERATING PERMIT CONDITIONS
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(Revised)

CONDITIONS (continued):

- D. Total amount of natural gas use at the plant shall be limited to 355 MMscf per year (as a 12-month rolling sum).
- E. The emissions of oxides of nitrogen (NOx) from this plant shall in no case exceed 24.9 tons per year (as a 12-month rolling sum).

6. **Testing Requirements**

- A. PNI shall use EPA Method 24 or any alternative methods as approved by the Department as described in 25 Pa. Code Chapter 139 to determine the properties of all inks used in the sources listed in Condition 4.B. above use in this permit.

7. **Reporting and Recordkeeping**

- A. For printing presses and platemaking developer sources:
 - 1. PNI shall record the following information for the sources covered under this Operating Permit:
 - a. The amount of paper printed in each press each day and the number of plates developed each day;
 - b. The ink throughput for each printing press listed in condition 4.B. shall be kept on a daily basis.
 - 2. PNI shall keep all records and tests reports generated under this permit for a period of two (2) years and make them available to the Department at its request.
- B. For sources regulated under 25 Pa. Code Sections 129.91-95 (printing presses, platemaking developer and de minimis sources), PNI shall keep records to demonstrate compliance with Sections 129.91 - 129.94 of the Pennsylvania RACT regulations. All records shall be maintained at the facility for at least two (2) years and will be made available to the Department upon request. Recordkeeping shall be conducted for all VOC sources that are identified in the RACT proposal and shall include, where appropriate, material throughputs, or number of batches. Chemical usage, inventory records, and material balances shall be used to calculate VOC emissions using the Department approved method. All recordkeeping requirements from existing permits shall continue to be met.

OPERATING PERMIT CONDITIONS
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(Revised)

CONDITIONS (continued):

- C. For sources regulated under 25 Pa. Code Sections 129.61 and 129.82, PNI shall keep records of production throughputs and make them available upon Department request.
8. Implementation Schedule
- The Company shall implement a monitoring and recordkeeping program specified in Condition 7 above upon issuance of this operating permit. All operating logs, records and monitoring data shall be kept on site for a minimum of two (2) years and shall be made available to the Department upon request.
9. This RACT approval applies to the emissions of NO_x and VOC pollutants only. Emissions of other pollutants, including criteria pollutants, shall be governed by existing Plan Approvals, Operating Permits, and the applicable requirements of the Rules and Regulations of the Department. Such approval, permits and requirements are incorporated herein by reference and made part of this permit. The Conditions of Plan Approvals and Operating Permits of 46-320-011 through 019 shall be incorporated to this Permit.
10. When a "zero VOC" fountain solution is used for all the facility presses covered by this operating permit, the company shall keep records necessary to demonstrate that there is no VOC emissions from fountain solution usage. This condition supersedes the recordkeeping condition of Operating Permits 46-320-011 through 019 for the fountain solution usage only.
11. The expiration date shown on the Operating Permit OP-46-0012 is for State purposes only. For Federal enforcement purposes the Operating Permit shall remain in effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed pursuant to 40 C.F.R. 51 and approved by United States Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by EPA upon its approval of the above as a revision to the SIP.
12. The Operating Permit issued on August 30, 1996 is revised to include the following sources:
- A. Back-up generator
- Manufacturer: Caterpillar
Model No.: 3412
Rated Input: 4.88 MM Btu/hr
- B. Fire Pump
- Manufacturer: Fire Trol, Inc., Cummings Engine
Model No.: FTA 1100, 6BTA-5.9L

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-46-0012
PHILADELPHIA NEWSPAPERS, INC.
(Revised)

CONDITIONS (continued):

Rated Input: 1.78 MM Btu/hr (244 hp)

- C. Four plate making film processor
Newsroom HVAC unit
Newsroom film processor
- 13. Both the back-up generator and the fire pump shall be limited to 500 hours of operation individually on a 12-month rolling basis.
- 14. The presumptive RACT emissions limitations for the above two sources shall be installation, operation and maintenance of the sources in accordance with manufactures specifications.
- 15. The three sources in 12.C are considered de minimis sources and each shall be operated with VOC emissions rates of no greater than three pounds per hour, 15 pounds per day and 2.7 tons/year (as a 12-month rolling sum) whichever is more stringent.

Re 30 (RN00)67-15

