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



OPERATING PERMIT

PERMITS OFFICE

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-15-0002</u>	Source(s)	<u>Facility NOx and VOC Sources</u>
Owner	<u>Quebecor Printing Atglen, Inc.</u>	Air	<u></u>
Address	<u>PO Box 464</u>	Cleaning	<u></u>
	<u>Atglen, PA 19310-0465</u>	Device	<u></u>
Attention	<u>Diane E. Potts</u>	Location	<u>Lower Valley Road, Route 372</u>
	<u>Environmental Technical Supervisor</u>		<u>West Sadsbury Township</u>
			<u>Chester 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. in compliance with the specifications and conditions of the plan approval issued under the same number;
 - c. 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 12/10/1996

Expires 12/10/2001

Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (KAL)303.10

OPERATING PERMIT CONDITIONS
PERMIT NO. OP-15-0002
QUEBECOR PRINTING ATGLEN, INC.

CONDITIONS (continued):

3. General Requirements

- A. The expiration date shown on the Operating Permit, OP-15-0002, 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purposes the Operating Permit shall remain in effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed pursuant to 40 CFR § 51 and approved by the United States Environmental Protection Agency (EPA). ~~The Operating Permit shall become enforceable by the EPA upon its approval of the above as a revision to the SIP.~~
- B. This operating permit is being issued to Quebecor Printing Atglen, Inc., located at Lower Valley Road, Route 372, West Sadsbury Township, Chester County, for the operation of oxides of nitrogen (NOx) and volatile organic compounds (VOCs) emission sources regulated under 25 Pa. Code §§ 129.91 - 129.95. This Operating Permit, OP-15-0002, also specifies Quebecor Printing Atglen, Inc.'s, Reasonably Available Control Technology (RACT) requirements for sources of NOx. Other pollutants are regulated under the applicable provisions of Title 25 of the Pennsylvania Code and by existing permit conditions which are incorporated herein.
- ~~C. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and shall allow the Department to have access at any time to said source(s) with such measuring and recording equipment, including equipment for recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.~~
- D. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

4. Consolidation of Permits

This operating permit supersedes all previously issued operating permits, plan approvals and/or plan approval applications bearing the number(s): 15-320-007C, 15-320-007D, 15-320-011A, and 15-320-016.

**OPERATING PERMIT CONDITIONS
PERMIT NO. OP-15-0002
QUEBECOR PRINTING ATGLEN, INC.**

CONDITIONS (continued):

- A. The following conditions apply to Presses 1, 2, 3, 4, & 4A, under Operating Permit, 15-320-007C.
- i. The company shall record the amounts of solvent removed as a waste and recovered by the control unit. The company shall record the quantity and identity of all VOC solvents used for cleanup purposes.
- B. The following conditions apply to Press No. 6, under Operating Permit 15-320-011A.
- i. The actual VOC emissions to the atmosphere from Printing Press No. 6 shall not exceed:
 1. Maximum Peak Hourly Rate: 79 lbs/hr
 2. Maximum Peak Daily Rate: 1896 lbs/day
 3. Annual rate, on a 12 month running annual basis calculated monthly: 206 tons per year.
- C. The following conditions apply to the Proof Press, under 15-320-016.
- i. This rotogravure press has 4 printing units with 5 low level exhaust points and 4 main exhaust points. All of these exhaust points go into a manifold which leads into the existing Solvent Recovery System.
 - ii. Emission reductions resulting from the control of the rotogravure proof press required by 25 Pa. Code § 129.67 are not bankable as emission reduction credits for offset purposes.

5. **RACT Implementation**

- A. RACT for boilers #1, 2, 3, and 4 shall be an annual tune-up on the combustion process. The annual tune-up of the combustion process shall consist of but not be limited to the following.
- i. Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
 - ii. Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NOx, and, to the extent practicable, minimize the emissions of CO.

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QUEBECOR PRINTING ATGLEN, INC.**

CONDITIONS (continued):

- iii. Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.
 - iv. Each adjustment conducted under the procedures in Condition (5)(A)(i-iii) shall be recorded in a permanently bound log book.
 - 1. The date of the tuning procedure.
 - 2. The name of the service company and technicians.
 - 3. The final operating rate or load.
 - 4. The final CO and NO_x emission rates.
 - 5. The final excess oxygen rate.
 - v. The annual adjustment shall be made in accordance with the EPA document "Combustion Efficiency Optimization Manual for Operators of Oil and Gas-fired Boilers," September 1983 (EPA-340/1-83-023) or equivalent procedures approved in writing by the Department.
- B. The emissions of NO_x from boilers #1, 2, 3, & 4, shall not exceed the following.
- i. Boiler #1: 0.143 lbs/MMBtu and 15.78 tons in a 12 month rolling period
 - ii. Boiler #2: 0.143 lbs/MMBtu and 15.78 tons in a 12 month rolling period
 - iii. Boiler #3: 0.143 lbs/MMBtu and 18.41 tons in a 12 month rolling period
 - iv. Boiler #4: 0.143 lbs/MMBtu and 18.41 tons in a 12 month rolling period
- C. In accordance with 25 Pa. Code § 129.92, the company shall limit the emissions of volatile organic compounds to the following:
- i. Graymill Parts Washer Tanks (4 units): 1.8 lbs/hr and 13.78 tons in a 12 month rolling period.
 - ii. Cleaning Solvents: 1.8 tons in a 12 month rolling period.

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QUEBECOR PRINTING ATGLEN, INC.**

CONDITIONS (continued):

6. Operational Limitations

- A. Presses 4A and 6 are subject to Subpart QQ of the Standards of Performance for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 40 CFR § 60.4 requires submission of copies of all requests, reports, applications, submittals and other communications to both the EPA and the Department. The EPA copies shall be forwarded to:

Director
Air, Toxics and Radiation Division
USEPA, Region III
841 Chestnut Building
Philadelphia, PA 19107

Presses 1, 2, 3, and 4 are not subject to Subpart QQ of the Standards of Performance for New Stationary Sources.

7. Emission Reduction Credits

- A. The company has generated and created emission reduction credits in the amount of 260 tons per year by overcontrolling the emissions of volatile organic compounds from presses No. 1, 2, 3, and 4. The emission reduction credits have an unlimited lifetime unless the sources are shut down as per (25 Pa. Code § 127.206 (e) and (f).

Permit No.	Source No.	Solvent Recovery System (SRS) No.	Emission Limitations ¹			Allowable Emissions, tpy
			lbs/hr	lbs/day	tons/yr	
15-320-007C	1,2,3, & 4	SRS 1	4000	48,000	2,275	2,275
15-320-007C	4A	SRS 2				
15-320-016	Proof Press	SRS 1				85
15-320-011A	Press 6	SRS 2	79	1,896	206	206

¹Presses 1, 2, 3, 4, and 4A are limited to a combined 4000 lbs/hr, 48,000 lbs/day, and 2,275 tons per year.

- B. The company shall be allowed to use the ERCs generated and created by the overcontrol of fugitive emissions from Presses No. 1, 2, 3, 4, and 4A as internal offsets only.
- C. When presses No. 1, 2, 3, and 4 are operating, solvent recovery system No. 1 shall maintain an overall capture and control efficiency of 85%. The facility, as a whole, shall maintain an overall capture and control efficiency of 91%.

OPERATING PERMIT CONDITIONS
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QUEBECOR PRINTING ATGLEN, INC.

CONDITIONS (continued):

8. Recordkeeping Requirements

Sufficient data shall be recorded, in a format approved by the Department, so that compliance with the conditions in this Operating Permit can be determined. Records shall be kept for a minimum of two (2) years and shall be made available to the Department upon request.

- A. The company shall maintain records which, at a minimum, include a certification from the fuel supplier of the nitrogen content of the No. 6 fuel oil and identification of the sampling method and sampling protocol.
- B. The company shall record the following information for the printing presses covered under this operating permit, OP-15-0002:
 - i. the hours of operation of each individual printing press;
 - ii. the daily coating quantity in gallons and pounds of coating as applied; and
 - iii. the coating composition:
 - 1. percent solids by volume
 - 2. percent solvents by volume
 - 3. percent water by volume
 - 4. pounds of VOC per gallon minus water
 - 5. solvent density
- C. The company shall record, on a daily basis, the quantity and identity of all solvents that contain VOCs used for cleaning purposes on all presses.
- D. The company shall keep a copy of the manufacturer's specifications for installation, maintenance, and operation of the boilers. Records of repair and maintenance of the boilers shall also be kept.