



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 1-4728-04190/00004
Effective Date:

Expiration Date:

Permit Issued To: ALCAN PACKAGING FOOD AND TOBACCO INC
8770 WEST BRYN MAWR AVE
CHICAGO, IL 60681

Contact: ANDY BOLTON
ALCAN PACKAGING
100 WILSHIRE BLVD
BRENTWOOD, NY 11717
(631) 794-2905

Facility: ALCAN PACKAGING
100 WILSHIRE BLVD
EDGEWOOD, NY 11717

Contact: PIOTR SOWA
ALCAN PACKAGING FOOD AND TOBACCO INC
100 WILSHIRE BLVD
BRENTWOOD, NY 11717
(631) 794-2911

Description:

Alcan Packaging operates a facility in Edgewood, Town of Islip, for the manufacturing of labels for consumer and industrial products. The Edgewood facility contains provisions for four central-impression (CI) flexographic printing lines, two ink jet printing units, two seaming/forming machines, and a flexographic plate-making process (all identified under the grouping of Emission Unit 1-Print).

Volatile Organic Compound (VOC) emissions generated from solvent based operations are captured and controlled through the use of Permanent Total Enclosure technology (meeting criteria for 100% VOC capture efficiency) and the use of two (2) regenerative thermal oxidizers (RTOs). The oxidizers will be operated to perform with minimum VOC destruction efficiencies of 98%. A catalytic oxidizer operates as a backup to be used if one of the RTOs is out of service.

Applicable Federally enforceable annual emission limits are 60 tons per year (tpy) of VOC, 22.5 tpy of nitrogen oxides (NO_x), 22.5 tpy of hazardous air pollutants (HAPs), and 9 tpy of any individual HAP. These limits were established to meet major nonattainment area new source review requirements, and to establish area source status for HAP emissions.



By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: SUSAN ACKERMAN
NYSDEC - SUNY @ STONY BROOK
50 CIRCLE RD
STONY BROOK, NY 11790-3409

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and
Determinations
Applications for permit renewals, modifications and transfers
Permit modifications, suspensions or revocations by the Department
Permit modifications, suspensions or revocations by the Department

Facility Level

Submission of application for permit modification or renewal - REGION
1 HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.



Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

Condition 5: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 5.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 6: Submission of application for permit modification or renewal - REGION 1 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 6.1:

Applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 1 Headquarters
Division of Environmental Permits
Stony Brook University
50 Circle Road
Stony Brook, NY 11790-3409
(631) 444-0365



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: ALCAN PACKAGING FOOD AND TOBACCO INC
8770 WEST BRYN MAWR AVE
CHICAGO, IL 60681

Facility: ALCAN PACKAGING
100 WILSHIRE BLVD
EDGEWOOD, NY 11717

Authorized Activity By Standard Industrial Classification Code:
2671 - PAPER COATED AND LAMINATED PACKAGING
2759 - COMMERCIAL PRINTING, NEC

Permit Effective Date:

Permit Expiration Date:



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 202-2.1: Compliance Certification
- 7 6NYCRR 202-2.5: Recordkeeping requirements
- 8 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 9 6NYCRR 200.7: Maintenance of Equipment
- 10 6NYCRR 201-1.7: Recycling and Salvage
- 11 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 12 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 13 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 14 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 15 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 16 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 17 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 18 6NYCRR 202-1.1: Required Emissions Tests
- 19 6NYCRR 211.3: Visible Emissions Limited
- 20 40CFR 68: Accidental release provisions.
- 21 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 22 6NYCRR 201-6: Emission Unit Definition
- 23 6NYCRR 201-6.5(e): Compliance Certification
- 24 6NYCRR 201-7: Facility Permissible Emissions
- *25 6NYCRR 201-7: Capping Monitoring Condition
- 26 6NYCRR 212.4(a): Compliance Certification
- 27 6NYCRR 212.4(a): Compliance Certification
- 28 6NYCRR 231-2.4: Emission offset requirements
- 29 6NYCRR 234.1(g): Facilities subject to Part 234 remain subject even if emissions go below applicability threshold
- 30 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 31 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 32 6NYCRR 234.5(a): Prohibition of Sale or Specification
- 33 6NYCRR 234.6: Compliance Certification
- 34 40CFR 63.820(a)(7), Subpart KK: Compliance Certification
- 35 40CFR 63.820(a)(7), Subpart KK: Compliance Certification
- 36 40CFR 63.830(b)(1), Subpart KK: Compliance Certification

Emission Unit Level

- 37 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 38 6NYCRR 201-6: Process Definition By Emission Unit

EU=0-7USTS

- 39 6NYCRR 229.3(e)(2)(v): Compliance Certification

EU=1-PRINT



- 40 6NYCRR 212.4(a): Compliance Certification
- 41 6NYCRR 231-2.2: Compliance Certification
- 42 6NYCRR 231-2.5: Compliance Certification
- 43 6NYCRR 234.3(a)(3)(iii): flexographic printing control requirement
- 44 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 45 6NYCRR 234.3(e): Compliance Certification
- 46 6NYCRR 234.4(b)(1): control requirement
- 47 6NYCRR 234.4(b)(2): control requirement
- 48 6NYCRR 234.4(b)(3): Compliance Certification
- 49 6NYCRR 234.4(b)(4): sampling
- 50 6NYCRR 234.4(c): control requirement
- 51 40CFR 64: Compliance Certification
- 52 40CFR 64: Compliance Certification
- 53 40CFR 64: Compliance Certification
- 54 40CFR 64: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 55 ECL 19-0301: Contaminant List
- 56 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 57 6NYCRR 211.2: Air pollution prohibited

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or

operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



- Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This 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 any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**



If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the



effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.



Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

**Condition 1: Acceptable Ambient Air Quality
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Condition 2: Fees
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 201-6.5(a)(7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

**Condition 3: Recordkeeping and reporting of compliance monitoring
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 201-6.5(c)

Item 3.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;



(ii) The date(s) analyses were performed;

(iii) The company or entity that performed the analyses;

(iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;

(v) The results of such analyses including quality assurance data where required; and

(vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification

Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible



official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.



The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 202-2.1

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 7: Recordkeeping requirements
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 202-2.5

Item 7.1:

(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 8: Open Fires Prohibited at Industrial and Commercial Sites
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 215

Item 8.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 9: Maintenance of Equipment

Applicable Federal Requirement: 6NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Applicable Federal Requirement: 6NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Applicable Federal Requirement: 6NYCRR 201-1.8

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Applicable Federal Requirement: 6NYCRR 201-3.2(a)

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Applicable Federal Requirement: 6NYCRR 201-3.3(a)

Item 13.1:



The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

**Condition 14: Standard Requirement - Provide Information
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-6.5(a)(4)

Item 14.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any 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. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

**Condition 15: General Condition - Right to Inspect
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-6.5(a)(8)

Item 15.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Condition 16: Standard Requirements - Progress Reports
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-6.5(d)(5)

Item 16.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at



least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 17: Off Permit Changes
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 201-6.5(f)(6)

Item 17.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 18: Required Emissions Tests
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 202-1.1

Item 18.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 19: Visible Emissions Limited
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 211.3

Item 19.1:



Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Condition 20: Accidental release provisions.
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 68

Item 20.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

**Condition 21: Recycling and Emissions Reduction
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 82, Subpart F

Item 21.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

**Condition 22: Emission Unit Definition
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-6

Item 22.1:



The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-7USTS

Emission Unit Description:

This Emission Unit consists of the following seven (7) underground storage tanks. Six tanks are used to store solvents. The seventh tank is used for spill containment.

Tank #1 - 6,000 gallons Blend 80/20

Tank #2 - 6,000 gallons Blend 80/20

Tank(s) #3, #4, & #5 - 6,000 gallons total (3 2,000 gallons compartments)

Tank #3 - 2,000 gallons Alcan Blend AL-SS

Tank #4 - 2,000 gallons Blend 80/20

Tank #5 - 2,000 gallons Alcan Blend AL-SS

Tank #6 - 6,000 gallons Alcan Blend AL-SS

Tank #7 - 6,000 gallons spill containment

Building(s): UST Area

Item 22.2:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-PRINT

Emission Unit Description:

Multiple central-impression (CI) flexographic printing lines, two ink jet printing units, two seaming/forming machines, and a flexographic plate-making process. The flexographic printing lines have up to ten-color CI capability, downstream (in-line) coater/laminator capability, and back-side printing capability. Volatile Organic Compound (VOC) emissions generated from solvent based operations are captured and controlled through the use of Permanent Total Enclosure technology (meeting criteria for 100% VOC capture efficiency) and the use of two (2) regenerative thermal oxidizers (RTOs). A catalytic oxidizer operates as a backup to be used if one of the RTO units is out of service.

The water based adhesive exhaust from emission source PRES3 will be diverted from the plant's VOC emission control system. The make-up air for the water-based adhesive dryer for PRES3 is provided from outside air and the exhaust from the water-based adhesive dryer is discharged through a separate stack to the atmosphere.

Building(s): PLANT

**Condition 23: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 23.1:

The Compliance Certification activity will be performed for the Facility.



Item 23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
 - and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.
- iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:



USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

NYSDEC- Region 1 Headquarters
Stony Brook University
50 Circle Road
Stony Brook, NY 11790-3409

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2010.
Subsequent reports are due on the same day each year

Condition 24: Facility Permissible Emissions
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 201-7

Item 24.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following
Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY210-00-0
Name: OXIDES OF NITROGEN

PTE: 45,000 pounds per year

Condition 25: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 201-7

Item 25.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 231-2



Item 25.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 25.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 25.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 25.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 25.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 25.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility shall limit its NO_x emissions to 22.5 tons per year on a 12 month rolling total basis.

The owner or operator shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria. These records shall be kept on a monthly basis.

Calculation of Monthly Total NO_x Emissions:

$$\text{NO}_x(t) = \text{NG} + \text{EG} + \text{FP}$$

where:

NO_x(t) = Facility total monthly NO_x emissions (tons).



NG = Monthly NO_x emissions from all natural gas (NG) fired external combustion sources (tons).

EG = Monthly NO_x emissions from all NG fired emergency generators (tons).

FP = Monthly NO_x emissions from diesel fired fire pump IC engine (tons).

$$NG = (NGEC \times EF(ng))/2000$$

NGEC = Total monthly NG firing rate from all NG fired external combustion sources (million cubic feet).

EF(ng) = NO_x emission factor (100 lb/million cubic feet)

[AP-42, Section 1.4 Table 1.4-1, small boilers <100 MMBTU/hr, 7/98]

$$EG = (NGEG \times Hg \times EF(ric))/2000$$

NGEC = Total monthly NG firing rate from the emergency generator (million cubic feet).

Hg = Heating value of NG (1000 BTU/cf).

EF(ric) = NO_x emission factor (2.27 lb/MMBTU)

[AP-42, Section 3.2, Table 3.2-3, 7/00 - for a 4 stroke rich burn engine]

$$FP = (FPO \times EF(icd) \times HR(fp))/2000$$

FPO = Rated output of diesel fired fire pump IC engine (210 HP)

EF(icd) = NO_x emission factor from manufacturer - Clarke model JU6H-UF50 (1.41E-02 lb/hp-hr).

HR(fp) = Number of hours fire pump engine is operated during the month (hr).

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 45000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 26: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall operate the oxidizers to ensure that oxidizer capacity is sufficient to achieve a minimum 98% destruction efficiency. The 98% destruction efficiency is required by both BACT (Part 212) and LAER (Part 231-2).

Press interlocks are installed in conjunction with oxidizer system programming controls that are designed to prevent oxidizer system operation at overcapacity (volumetric airflow) conditions. The electronic data recorder serving the oxidizer system continuously monitors fan speed (hertz) for each operating oxidizer and generates data demonstrating fan operation vs time.

Programming controls are in place to prevent press operation in the case that sufficient oxidizer capacity is not on-line. Sufficient oxidizer capacity shall be based upon operating parameters determined during the most recent round of performance evaluation testing.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 27.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-PRINT
Process: 128

Emission Point: 00001
Emission Source: OXID1

Emission Unit: 1-PRINT
Process: 128

Emission Point: 00002
Emission Source: OXID2

Emission Unit: 1-PRINT
Process: 128

Emission Point: 00006
Emission Source: OXID3

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP
CAS No: 0NY998-00-0 VOC



Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

[6 NYCRR Part 231-2, 40 CFR 63 Subpart KK, 40 CFR 64]

Testing of each of the Catalytic and Thermal Oxidizers will be conducted at least once during the term of this permit in order to demonstrate a minimum VOC destruction efficiency of 98%. The 98% destruction efficiency is required by both BACT (Part 212) and LAER (Part 231-2).

Within 60 days of the installation date of any new oxidizers, a test protocol shall be submitted to the Department for review. Within 120 days of the installation date, the testing will be completed.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 98 percent reduction by weight

Reference Test Method: 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 28: Emission offset requirements
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 231-2.4

Item 28.1:

To satisfy the emission offset requirements of Part 231, the facility has obtained 78 (60 + 30%) VOC Emission Reduction Credits (ERCs) from the following sources:

Facility Name	DEC ID	ERCs (tpy)
Alcan Packaging	1-2820-00185	78

**Condition 29: Facilities subject to Part 234 remain subject even if emissions go below applicability threshold
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 234.1(g)

Item 29.1:

Any printing process that is subject to the provisions of 6NYCRR Part 234 will remain subject to these provisions even if the emissions of volatile organic compounds from the facility later fall below the applicability criteria.



Condition 30: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.3(a)(3)(iii)

Item 30.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-PRINT

Process: 128

Emission Source: OXID1

Emission Unit: 1-PRINT

Process: 129

Emission Source: OXID1

Emission Unit: 1-PRINT

Process: 131

Emission Source: OXID1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

CAS No: 0NY998-00-0 VOC

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

[6 NYCRR Part 231-2, 40 CFR 63 Subpart KK, 40 CFR
64]

Ensure proper destruction of VOC emissions by maintaining
a minimum operating temperature of 550 degrees Fahrenheit
in the catalytic oxidizer to provide an overall control of
VOC emissions of 60%.

The temperature shall be continuously monitored and
recorded by the oxidizer's temperature control system.

Manufacturer Name/Model Number: Megtec Magnum Catalytic Oxidizer

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 31: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.3(a)(3)(iii)

**Item 31.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-PRINT Process: 128	Emission Point: 00006 Emission Source: OXID2
Emission Unit: 1-PRINT Process: 128	Emission Point: 00006 Emission Source: OXID3
Emission Unit: 1-PRINT Process: 129	Emission Point: 00006 Emission Source: OXID2
Emission Unit: 1-PRINT Process: 129	Emission Point: 00006 Emission Source: OXID3
Emission Unit: 1-PRINT Process: 131	Emission Point: 00006 Emission Source: OXID2
Emission Unit: 1-PRINT Process: 131	Emission Point: 00006 Emission Source: OXID3
Regulated Contaminant(s):	
CAS No: 0NY100-00-0	HAP
CAS No: 0NY998-00-0	VOC

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

[6 NYCRR Part 231-2, 40 CFR 63 Subpart KK, 40 CFR 64]

Ensure proper destruction of VOC emissions by maintaining a minimum operating temperature of 1550 degrees Fahrenheit in the thermal regenerative oxidizer to provide an overall control of VOC emissions of 60%.

The temperature shall be continuously monitored and recorded by the oxidizer's temperature control system.

Manufacturer Name/Model Number: Megtech Clean Switch Thermal Regenerative Oxidizer & TBD

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).



**Condition 32: Prohibition of Sale or Specification
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 234.5(a)

Item 32.1:

No person shall sell, specify, or require for use, the application of a coating or ink on a substrate at a facility with a printing process subject to the volatile organic compound control requirements of 6 NYCRR Part 234 if such use is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which any coating or ink is to be applied to any substrate at any affected facility. This prohibition shall not apply to the following:

(1) coatings and/or inks utilized at printing processes where control equipment has been installed to achieve compliance;

(2) coatings and/or inks utilized at printing processes that have been granted variances for reasons of technological and economic feasibility.

**Condition 33: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 234.6

Item 33.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following work practices are prohibited:

(a) using open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or ink/coating removal;

(b) storage in open containers of spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;

(c) use of open containers to store or dispose of inks and/or surface coatings; or

(d) use of open containers to store or dispense inks and/or surface coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual



device or equipment designed for the purposes of applying an ink or coating to a substrate.

To ensure that these work practices are not in use, the facility will conduct daily inspections for the presence of any open containers as described in the prohibitions above and maintain a log book of these inspections. Any such open containers shall be closed immediately. The log book should include the following information at a minimum:

- date and time of inspection
- items or areas observed
- corrective measures taken, if

necessary.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.820(a)(7), Subpart KK

Item 34.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A printing and publishing facility that has the potential to emit (PTE) HAP emissions above any of the Major Source thresholds may establish area source status by limiting its PTE through permit conditions. Emissions from the facility will be determined and recorded on a monthly basis. Compliance with the PTE limit must be maintained during every rolling 12 month period after the limit is established.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 30 days after first annual (12 month) period following Permit

Issue Date

Condition 35: Compliance Certification
Effective for entire length of Permit



Applicable Federal Requirement: 40CFR 63.820(a)(7), Subpart KK

Item 35.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility shall limit its total emissions to less than nine (9) tons for each individual HAP and to less than 22.5 tons for any combination of HAP's on a 12 rolling total basis.

The owner or operator of each facility which commits to the criteria of 40 CFR 63.820(a)(2) for the purpose of establishing an area source of HAP's shall maintain records of all required measurements and calculations needed to demonstrate compliance with area source status.

These records shall be kept on a monthly basis and shall include the mass of all HAP-containing materials used during the month, and the mass fraction of HAP present in each HAP-containing material used.

Calculations:

There are no HAP's expected to be emitted by the printing operations; however if HAP's are present in the solvents used in the printing operations, HAP emissions will be calculated as follows:

Monthly Calculations:

$$\text{HAP}(i) = (\text{TS} \times \text{F}(\text{HAP}(i)) \times \text{CEP} \times (1 - \text{DE}/100))/2000$$

where:

HAP(i) = Monthly HAP emissions from printing operations of an individual HAP (tons).

TS = Total amount of solvents used during the month (pounds).

CEP = VOC capture efficiency from print lines (percent).



$F(\text{HAP}(i))$ = Maximum fraction of solvents used that is comprised of the individual HAP species.

DE = VOC destruction efficiency in the oxidizers (percent).

Facility Total Emission Rate of all HAP's

$$\text{HAP}(t) = S(\text{HAP}(i)) + \text{HAP}(c)$$

where:

$\text{HAP}(t)$ = Facility total monthly emission rate of all HAP's.

$S(\text{HAP}(i))$ = Monthly sum of all individual HAP emissions from printing operations (tons).

$\text{HAP}(i)$ = Monthly HAP emissions from printing operations of an individual HAP (tons).

$\text{HAP}(c)$ = Monthly total emission rate of all HAP's from combustion sources (0.053 tons).

Parameter Monitored: HAP

Upper Permit Limit: 45000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 36: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.830(b)(1), Subpart KK

Item 36.1:

The Compliance Certification activity will be performed for the Facility.

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to this subpart shall submit the reports specified below to the Administrator:

(1) An initial notification required in Sec. 63.9(b).

(i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in Sec. 63.826(a).

(ii) Initial notifications for new and reconstructed



sources shall be submitted as required by Sec. 63.9(b).

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

(iv) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

****** Emission Unit Level ******

**Condition 37: Emission Point Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-6

Item 37.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-7USTS

Emission Point: 000T1

Height (ft.): 8 Diameter (in.): 2

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: UST Area

Emission Point: 000T2

Height (ft.): 8 Diameter (in.): 2

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: UST Area

Emission Point: 000T3

Height (ft.): 8 Diameter (in.): 2

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: UST Area

Emission Point: 000T4

Height (ft.): 8 Diameter (in.): 2

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: UST Area

Emission Point: 000T5

Height (ft.): 8 Diameter (in.): 2

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: UST Area



Emission Point: 000T6
 Height (ft.): 8 Diameter (in.): 2
 NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: UST Area

Emission Point: 000T7
 Height (ft.): 8 Diameter (in.): 2
 NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: UST Area

Item 37.2:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-PRINT

Emission Point: 00001
 Height (ft.): 52 Diameter (in.): 52
 NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Emission Point: 00002
 Height (ft.): 52 Length (in.): 42 Width (in.): 76
 NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Emission Point: 00003
 Height (ft.): 44 Diameter (in.): 3
 NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Emission Point: 00004
 Height (ft.): 45 Diameter (in.): 12
 NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Emission Point: 00005
 Height (ft.): 12 Diameter (in.): 24
 NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Emission Point: 00006
 Height (ft.): 68 Diameter (in.): 62
 NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

**Condition 38: Process Definition By Emission Unit
 Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-6

Item 38.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-7USTS
 Process: TNK Source Classification Code: 4-05-007-01
 Process Description:
 Loading and storage of solvents in six (6) underground
 storage tanks and spill containment liquid in one (1)
 underground storage tank.



Emission Source/Control: 0UST1 - Process
Design Capacity: 6,000 gallons

Emission Source/Control: 0UST2 - Process
Design Capacity: 6,000 gallons

Emission Source/Control: 0UST3 - Process
Design Capacity: 2,000 gallons

Emission Source/Control: 0UST4 - Process
Design Capacity: 2,000 gallons

Emission Source/Control: 0UST5 - Process
Design Capacity: 2,000 gallons

Emission Source/Control: 0UST6 - Process
Design Capacity: 6,000 gallons

Emission Source/Control: 0UST7 - Process
Design Capacity: 6,000 gallons

Item 38.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-PRINT

Process: 128

Source Classification Code: 4-05-003-01

Process Description:

Operation of multiple CI flexographic printing lines, two ink jet printing units, flexographic plate-making process, and seaming/forming machines; all emissions will be captured in a permanent total enclosure and sent to the oxidizers for control.

Emission Source/Control: OXID1 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: OXID2 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: OXID3 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: CLEAN - Process
Design Capacity: 185 gallons

Emission Source/Control: INKJ2 - Process

Emission Source/Control: INKJT - Process

Emission Source/Control: PRES2 - Process
Design Capacity: 10 Color Units



Emission Source/Control: PRES3 - Process
Design Capacity: 10 Color Units

Emission Source/Control: PRES4 - Process

Emission Source/Control: PRESS - Process
Design Capacity: 10 Color Units

Emission Source/Control: SEAM2 - Process

Item 38.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-PRINT

Process: 129

Source Classification Code: 4-05-005-97

Process Description:

Flexographic plate-making process employing low-emitting organic wash/cleaning materials. VOC emissions from this process will be captured and sent to the oxidizers for control. This process covers flexographic plate making operations.

Emission Source/Control: OXID1 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: OXID2 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: OXID3 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: GRAP2 - Process

Emission Source/Control: GRAPH - Process

Item 38.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-PRINT

Process: 131

Source Classification Code: 4-01-002-96

Process Description:

Non-vapor phase parts washer that uses only organic solvents with an initial boiling point greater or equal to 300 degrees F at atmospheric pressure and a vapor pressure less than 1.00 mm Hg at 20 degrees C. The powered exhaust from the washer and fugitive VOC emissions from the parts washer room are ducted to the oxidizers for control. This process covers the parts washing operation.

Emission Source/Control: OXID1 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER



Emission Source/Control: OXID2 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: OXID3 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: CLEAN - Process
Design Capacity: 185 gallons

Condition 39: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(v)

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-7USTS

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 40: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 40.2:



Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility shall operate the oxidizers to ensure that oxidizer capacity is sufficient to achieve a minimum 98% destruction efficiency. The 98% destruction efficiency is required by both BACT (Part 212) and LAER (Part 231-2).

This shall be accomplished through programming controls to disallow press operation if sufficient oxidizer capacity is not on-line.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 98 percent reduction by weight

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 231-2.2

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility shall limit its VOC emissions to 60 tons per year on a 12 month rolling total basis.

The owner or operator shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria.

These records shall be kept on a monthly basis.



Calculation of Monthly Total VOC Emissions:

$$\text{VOC (t)} = \text{PRINT} + \text{GRAPH} + \text{CLEAN} + \text{COMB}$$

VOC(t) = Facility total monthly VOC emissions (tons).

PRINT = Monthly VOC emissions from printing operations (tons).

GRAPH = Monthly VOC emissions from graphic operations (tons).

CLEAN = Monthly VOC emissions from parts washer (tons).

COMB = Monthly VOC emissions from combustion sources (tons).

$$\text{PRINT} = (\text{TP} \times (\text{CEP}/100) \times (1 - \text{DE}/100))/2000$$

TP = Monthly VOC throughput from presses, inkjet printing units, and seaming/forming machines (lbs).

CEP = VOC capture efficiency from presses, inkjet printing units, and seaming/forming machines (%).

DE = VOC destruction efficiency (%).

$$\text{GRAPH} = \text{N} \times (\text{D} + \text{F}) \times (\text{CEG}/100) \times (1 - \text{DE}/100)/2000$$

N = number of square inches of plates made per month (square inches).

D = maximum dryer plate-making VOC emission factor (0.00010 lb/sq. inch).

F = maximum fugitive plate-making VOC emission factor (0.00006 lb/sq. inch).

CEG = VOC capture efficiency from graphic printing areas (%).

DE = VOC destruction efficiency (%).

$$\text{CLEAN} = (\text{TC} \times (\text{CEC}/100) \times (1 - \text{DE}/100))/2000$$

TC = Monthly VOC throughput in parts cleaner (lbs).

CEC = VOC capture efficiency from parts cleaner (%).

DE = VOC destruction efficiency (%).

$$\text{COMB} = \text{NG} + \text{EG} + \text{FP}$$

NG = Monthly VOC emissions from all natural gas (NG) fired external combustion sources (tons).

EG = Monthly VOC emissions from all NG fired emergency generators (tons).

FP = Monthly VOC emissions from diesel fired fire pump IC engine (tons).

$$\text{NG} = (\text{NGEC} \times \text{EF}(\text{ng}))/2000$$

NGEC = Total monthly NG firing rate from all NG fired



external combustion sources (million cubic feet).

EF(ng) = VOC emission factor (5.5 lb/million cubic feet)

$$EG = (NGEG \times Hg \times EF(ng))/2000$$

NGEG = Total monthly NG firing rate from the emergency generator (million cubic feet).

Hg = Heating value of NG (1000 BTU/cf).

EF(ng) = VOC emission factor (2.96E-2 lb/MMBTU)

$$FP = (FPO \times EF(ng) \times HR(fp))/2000$$

FPO = Rated output of diesel fired fire pump IC engine (210 HP)

EF(ng) = Total Hydrocarbon emission factor from manufacturer - Clarke model JU6H-UF50 (4.63E-04 lb/hp-hr).

HR(fp) = Number of hours fire pump engine is operated during the month (hr.).

Parameter Monitored: VOC

Upper Permit Limit: 60 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 42: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 231-2.5

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

LAER emission limit. Records for demonstration of compliance with the VOC emission limit shall be maintained on site for five years. Any exceedances of the allowable



annual VOC emission limitation must be reported in writing to the DEC Regional office within 10 working days of the exceedance.

Parameter Monitored: VOC

Upper Permit Limit: 60 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**Condition 43: flexographic printing control requirement
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 234.3(a)(3)(iii)

Item 43.1:

This Condition applies to Emission Unit: 1-PRINT

Item 43.2:

Where a flexographic printing process is employed the capture system and air cleaning device must provide for an overall reduction in volatile organic compound emissions of at least 60.0 percent.

**Condition 44: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 234.3(a)(3)(iii)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall ensure proper capture of VOC emissions through monthly inspections and maintenance (where required) of capture equipment.

The facility shall document inspections and maintenance activities in an on-site logbook.

Compliance with this condition shall be certified as part of the facility's annual report.



Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 45: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 10 percent or greater for any consecutive six-minute period from any emission source subject to 6NYCRR Part 234. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with 234.3(e) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee shall immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations, and



corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 10 percent
Reference Test Method: See monitoring description.
Monitoring Frequency: WEEKLY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 46: control requirement
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.4(b)(1)

Item 46.1:

This Condition applies to Emission Unit: 1-PRINT

Item 46.2:

The owner or operator must follow notification requirements, protocol requirements and test procedures of 6NYCRR Part 202 for testing and monitoring. Depending upon the conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 must be used when measuring volatile organic compound (VOC) concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

- (a) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography,
- (b) Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon,
- (c) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.
- (d) Methods not listed above must be approved in advance by the commissioner's representative and the United States Environmental Protection Agency.

Condition 47: control requirement
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.4(b)(2)

Item 47.1:

This Condition applies to Emission Unit: 1-PRINT

Item 47.2:



Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings and printing inks are presented in Appendix A, methods 24 and 24A respectively, of 40 CFR 60. Alternate analytical methods for surface coating and printing ink analysis must be approved by the commissioner and the USEPA. Instead of an ink solvent/volatile analysis, the commissioner may accept certification from the ink manufacturer of the composition of the ink solvent/volatiles, if supported by actual batch records.

Condition 48: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.4(b)(3)

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks, VOC and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the department's representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the commissioner's representative in a format acceptable to him or her. Records must be maintained at the facility of a period of five years.

The facility shall maintain the following records for each ink, cleaning solvent, and other VOC used in the printing process, on a monthly basis:

1. The brand and product name or code for the material.
2. The quantity of material used during the calendar month.
3. The VOC content of the material.

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the monthly log are to be kept on site.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 49: sampling
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.4(b)(4)

Item 49.1:

This Condition applies to Emission Unit: 1-PRINT

Item 49.2:

The results of any analysis or other procedure used for establishing compliance must be provided to the commissioner's representative. Representatives of the department shall be permitted, during reasonable business hours, to obtain ink and/or fountain solution samples for the purpose of determining compliance with 6NYCRR Part 234.

Condition 50: control requirement
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.4(c)

Item 50.1:

This Condition applies to Emission Unit: 1-PRINT

Item 50.2:

If an air cleaning device is used, continuous monitors of the following parameters shall be installed, periodically calibrated and operated at all times that the associated control equipment is operating:

- (a) exhaust gas temperature of all incinerators;
- (b) temperature rise across catalytic incinerator bed;
- (c) breakthrough of volatile organic compounds on a carbon adsorption unit;

and

- (d) any other continuous monitoring or recording device required by the

commissioner.

Condition 51: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 64

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

CAS No: 0NY998-00-0 VOC



Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

[6 NYCRR Part 231-2, 40 CFR 63 Subpart KK]

As part of the facility's Compliance Assurance Monitoring (CAM) Plan for the three oxidizers, the facility will perform monthly external inspections and annual internal inspections for wear and structural integrity. Maintaining the integrity of these systems ensures that the capture efficiency to is maintained.

An excursion is defined as any instance where the observation indicates that an oxidizer is structurally unsound.

A written or electronic log of every inspection will be maintained at the facility for at least five years.

Manufacturer Name/Model Number: Megtec Manum and both Megtec Clean Switch Oxidizers

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 52: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 64

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

CAS No: 0NY998-00-0 VOC

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

[6 NYCRR Part 231-2, 40 CFR 63 Subpart KK]

As part of the facility's Compliance Assurance Monitoring (CAM) Plan for the Megtec Catalytic Oxidizer, the facility will have the condition of the catalyst assessed annually.



The analysis will consist of evaluations of a sample of the catalyst. Conversion Efficiency (by FID or equivalent), Surface Area, and Contamination (Inductively Coupled Plasma (ICP)) results will be compared against a existing Megtec knowledge base.

An excursion is defined as any instance where the analysis results in a recommendation that corrective action be taken.

A written or electronic record of every analysis and corrective action taken will be maintained at the facility for at least five years.

Manufacturer Name/Model Number: Megtec Magnum - Catalyst
Reference Test Method: Conversion Efficiency, Surface Area & ICP
Monitoring Frequency: ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 53: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 64

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

CAS No: 0NY998-00-0 VOC

Item 53.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

[6 NYCRR Part 231-2, 40 CFR 63 Subpart KK]

As part of the facility's Compliance Assurance Monitoring (CAM) Plan for the permanent total enclosure, the facility will inspect the integrity of the exhaust system, from the process to the control device, and the integrity of the enclosure. Maintaining the integrity of these systems ensures that the capture efficiency to is maintained.

An excursion is defined as any instance where the integrity of the enclosure or capture system is



identified.

A written or electronic log of every inspection will be maintained at the facility for at least five years.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 54: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40 CFR 64

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

CAS No: 0NY998-00-0 VOC

Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

[6 NYCRR Part 231-2, 40 CFR 63 Subpart KK]

As part of the facility's Compliance Assurance Monitoring (CAM) Plan for the permanent total enclosure, the facility will monitor the pressure differential across the enclosure wall and the surrounding atmosphere. Maintaining negative pressure in the enclosure allows the capture efficiency to be maintained.

An excursion is defined as any three hour block where the pressure drop between the surrounding atmosphere and the enclosed area is less than 0.007 inches of water, based upon a three hour block average. This number is based upon Method 24 criteria.

Data will be collected at the enclosure wall and recorded electronically once every 15 minutes. All electronic or manual data logs will be maintained for five years.

The facility will report any excursions and corrective actions on a semiannual basis; if not more frequently.

Manufacturer Name/Model Number: ISO Tek T-SPM2000-010



Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 0.007 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 30 days after first semi-annual (6 month) period following
Permit Issue Date



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

**Condition 55: Contaminant List
Effective for entire length of Permit**

Applicable State Requirement:ECL 19-0301

Item 55.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY210-00-0



Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0

Name: VOC

**Condition 56: Unavoidable noncompliance and violations
Effective for entire length of Permit**

Applicable State Requirement: 6NYCRR 201-1.4

Item 56.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.



(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 57: Air pollution prohibited
Effective for entire length of Permit

Applicable State Requirement: 6NYCRR 211.2

Item 57.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

