

Facility DEC ID: 9140200808

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility

Permit ID: 9-1402-00808/00003

Effective Date:

Expiration Date:

Permit Issued To: MOD-PAC CORP
1801 ELMWOOD AVE
BUFFALO, NY 14207

Contact: MICHAEL SOBCZYNSKI
MOD-PAC CORP
1801 ELMWOOD AVENUE
BUFFALO, NY 14207
(716) 566-9299

Facility: MOD-PAC CORP
1801 ELMWOOD AVE
BUFFALO, NY 14207

Description:

The Facility is a commercial printing facility specializing in the printing and manufacture of custom folding cartons and stock packaging located at 1801 Elmwood Avenue Buffalo, Erie County. Processes pertinent to air emission permitting include offset lithographic printing presses, letterpresses, adhesive application, and emergency generators. This permit is Air State Facility (ASF), renewal 1, for continued operations at the Facility and incorporate changes from the Facility's multi-phase expansion initiated in 2016. This ASF permit replaces the Facility's existing ASF permit issued on August 15, 2016.

The permit includes conditions limiting emissions of volatile organic compounds (VOC) to below Air Title V thresholds. The Facility is required to track VOC emissions monthly on a 12-month rolling total and submit an annual capping certification report to ensure operations do not exceed permit emission limits.

The Facility is subject to 6 NYCRR Part 234 – Graphic Arts and Subpart 228-2 – Commercial and Industrial Adhesives, Sealants and Primers. The Facility operates a total of two (2) emission units as described below:

2-PRINT – This emission unit consists of five (5) offset lithographic printing presses [emission sources HDB10, HDB11, HB12R, HB14R, and HB16R], two (2) C&P letterpress machines [emission sources CPLP1-2], and nine (9) kluge letterpress units [emission sources KLGF1-7, and KLGI1-2]. These printing presses are subject to Part 234. All offset lithographic printing presses have been replaced during the Facility's multi-phase expansion initiated in 2016, other than HDB10. The HDB10 printing press can apply ultraviolet (UV) cured inks/coatings in addition to solvent/water-based inks/coatings, while all other printing presses can only apply non-UV cured inks/coatings. This emission unit previously included one additional (1) C&P letterpress machine and two (2) Virko printing units, which have been removed from the facility.

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4-MISCL – This emission unit consists of 11 gluing machines, denoted as emission sources GLU01 to 11, that fold cardboard cartons and apply various adhesives on folded edges to maintain shape. The adhesive application process is subject to Subpart 228-2. Previously, this emission unit included a lithographic plate cleaning machine and four (4) additional gluing machines, however, these machines were removed from the Facility.

Additional Rule Applicability:

3-GENR – This emission unit consists of six (6) natural gas fired engines/generators, two (2) diesel-powered fire suppression pumps, and two (2) back-up natural gas fired generators all of which meet permitting exemptions under 6 NYCRR Subpart 201-3, but must still remain in compliance with applicable regulations. The six (6) natural gas fired engines/generators, and the two (2) diesel-powered fire suppression pumps shall comply with the applicable parts of 40CFR63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The two (2) back-up natural gas fired generators shall comply with the applicable parts of 40CFR60 Subpart JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

The six (6) natural gas fired engines/generators were previously used to produce electricity for Facility operations until the year 2013 but are now only used on an emergency basis. Before the Facility can re-start these engines for power production beyond emergency use, a permit modification is required and all applicable requirements must be evaluated.

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: KRISTINE M CARLSON
NYSDEC - REGION 9
700 DELAWARE AVE
BUFFALO, NY 14209

Authorized Signature: _____ Date: ____ / ____ / ____

Facility DEC ID: 9140200808**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.

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PAGE LOCATION OF CONDITIONS

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DEC GENERAL CONDITIONS

General Provisions

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 - 5 2 Relationship of this Permit to Other Department Orders and Determinations
 - 5 3 Applications for permit renewals, modifications and transfers
 - 6 4 Permit modifications, suspensions or revocations by the Department
- Facility Level**
- 6 5 Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

Facility DEC ID: 9140200808**DEC GENERAL CONDITIONS******** General Provisions ********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: 6 NYCRR 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 the expiration of permits for Title V and State Facility Permits.

Item 3.3

Permits are transferable 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.

Facility DEC ID: 9140200808**Condition 4: Permit modifications, suspensions or revocations by the Department**
Applicable State Requirement: 6 NYCRR 621.13**Item 4.1:**

The Department reserves the right to exercise all available authority 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 5: Submission of application for permit modification or renewal-REGION 9**
HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
700 Delaware Ave.,
Buffalo, NY 14209
(716) 851-7130

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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1801 ELMWOOD AVE
BUFFALO, NY 14207

Authorized Activity By Standard Industrial Classification Code:

2759 - COMMERCIAL PRINTING, NEC
2657 - FOLDING PAPERBOARD BOXES

Permit Effective Date:

Permit Expiration Date:

PAGE LOCATION OF CONDITIONS

PAGE**FEDERALLY ENFORCEABLE CONDITIONS****Facility Level**

- 6 1 6 NYCRR 201-7.1: Facility Permissible Emissions
- 6 *2 6 NYCRR 201-7.1: Capping Monitoring Condition
- 9 3 6 NYCRR 211.2: Visible Emissions Limited
- 9 4 40CFR 60, NSPS Subpart JJJJ: Applicability
- 9 5 40CFR 63, Subpart ZZZZ: Applicability

Emission Unit Level**EU=2-PRINT**

- 10 6 NYCRR 234.3 (c) (1): Compliance Demonstration
- 11 7 6 NYCRR 234.3 (d) (1): Compliance Demonstration
- 12 8 6 NYCRR 234.5: Compliance Demonstration
- 13 9 6 NYCRR 234.6: Compliance Demonstration
- 13 10 6 NYCRR 234.7: Compliance Demonstration
- 14 11 6 NYCRR 234.8: Compliance Demonstration

EU=4-MISCL

- 15 12 6 NYCRR 228-2.4 (a): Compliance Demonstration
- 16 13 6 NYCRR 228-2.4 (b) (1): Compliance Demonstration
- 17 14 6 NYCRR 228-2.4 (b) (3): Compliance Demonstration
- 18 15 6 NYCRR 228-2.4 (b) (4): Compliance Demonstration
- 19 16 6 NYCRR 228-2.4 (d): Compliance Demonstration
- 20 17 6 NYCRR 228-2.5 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS**Facility Level**

- 23 18 ECL 19-0301: Contaminant List
- 23 19 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 24 20 6 NYCRR Subpart 201-5: Emission Unit Definition
- 25 21 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 25 22 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 26 23 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 26 24 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 27 25 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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.

Item C: Maintenance of Equipment - 6 NYCRR 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,

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required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

- (a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.
- (b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

Item E: Recycling and Salvage - 6 NYCRR 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 6 NYCRR.

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 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.

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 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 6 NYCRR Subpart 201-3. 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 6 NYCRR Subpart 201-3, 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 H: Proof of Eligibility for Sources Defined as Trivial

Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. 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 6 NYCRR Subpart 201-3, 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 I: Required Emission Tests - 6 NYCRR 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

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

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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.

FEDERAL APPLICABLE REQUIREMENTS**The following conditions are federally enforceable.****Condition 1: Facility Permissible Emissions
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 201-7.1****Item 1.1:**

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: 0NY998-00-0
Name: VOC

PTE: 96,000 pounds per year

**Condition 2: Capping Monitoring Condition
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 201-7.1****Item 2.1:**

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:

6 NYCRR 201-6.1

Item 2.2:

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

Item 2.3:

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

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other state and federal air pollution control requirements, regulations or law.

Item 2.4:

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 2.5:

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 2.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

(1) Facility-wide emissions of total volatile organic compounds (VOC) shall not equal or exceed 96,000 pounds per year (lbs/yr). The Facility has accepted these emission limitations, below the major source threshold of 100,000 lbs/yr, to avoid Title V applicability.

(2) The lithographic printing operations account for almost all the facility's VOC emissions. Of the materials used in the lithographic operations, the majority of the VOCs are produced from four types of materials including cleaning solutions, fountain solutions, blanket wash, and water-based coatings. Past usage indicates total VOC emissions from these materials are about 50,000 lbs/yr. The remaining VOC emissions from the facility typically equate to less than 3,000 lbs/yr and include inks, adhesives and exempt and trivial sources.

(3) Since the majority of VOCs are emitted from the lithographic cleaning solutions, fountain solutions, blanket wash, and water-based coatings the VOC emissions from these materials will be monitored on a monthly basis. The total facility VOC emissions will be certified annually. If the 12-month rolling emissions from the lithographic cleaning solutions, fountain solutions,

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blanket wash, and water-based coatings are greater than 80,000 lbs/yr, then VOC emissions from all VOC sources, including exempt and trivial sources, will immediately be inventoried and tracked on a 12-month rolling basis. The facility may assume a constant VOC emission rate for the exempt and trivial sources, as presented in the permit application, provided there are no significant changes in the emission sources.

(4) On-going compliance monitoring of the VOC emissions shall be documented as follows:

(a) Monthly VOC emission calculations shall be completed by multiplying the monthly usage or purchase of cleaning solutions, fountain solutions, blanket wash, and water-based coatings by the VOC content of the material. The VOC emissions for each month must be added to the previous 11 months to generate the 12-month rolling total VOC emissions for each month.

(b) An annual emission calculation shall be completed to demonstrate the facility total VOC emissions do not equal or exceed 96,000 lbs/yr.

(c) The following or similar information shall be maintained to demonstrate the emission calculations are verifiable and enforceable:

(i) a spreadsheet documenting each cleaning solution, fountain solution, blanket wash, and water-based coating; the VOC content of each material; the total amount of material used or purchased each month; the monthly VOC emission estimate for each material; the 12-month rolling total VOC emission estimate for each material; and the cumulative total VOC emission estimate for all the materials.

(ii) a current list of all VOC containing or producing products in use throughout the facility. This list must include: information on the manufacturer, brand, product name or code, VOC content, or other manufacturer's product specifications, material content reports or laboratory analyses providing this information;

(iii) all purchase orders, invoices, and other documents to support information in the compliance demonstration.

(5) An exceedance of the 96,000 lbs/yr total VOC emission limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall be reported immediately upon discovery.

(6) The facility must maintain all required records on-site for a period of five years and make them available to NYSDEC representatives upon request.

(7) On an annual basis, the facility shall submit to the Regional Air Pollution Control Engineer an Annual Capping Certification for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each rolling 12-month period throughout the calendar year. The report must be signed and certified by the facility's responsible official as to the truth, completeness, and accuracy of all the submitted information.

Parameter Monitored: VOC

Upper Permit Limit: 96000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 3: Visible Emissions Limited
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 211.2

Item 3.1:

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 4: Applicability
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 60, NSPS Subpart JJJJ

Item 4.1:

Facilities that have stationary spark ignition internal combustion engines must comply with applicable portions of 40 CFR 60 Subpart JJJJ.

Condition 5: Applicability Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 5.1:

Facilities that have reciprocating internal combustion engines must comply with applicable portions of 40 CFR 63 Subpart ZZZZ.

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******* Emission Unit Level *********Condition 6: Compliance Demonstration
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 234.3 (c) (1)****Item 6.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

(1) An offset lithographic or letterpress printing process that uses a cleaning material shall comply with the VOC content limits as follows:

(i) the cleaning material, as applied, contains less than 70 percent by weight VOC; or

(ii) the cleaning material, as applied, shall have a composite vapor pressure of less than or equal to 10 millimeters mercury at 20 degrees Celsius (10 mm Hg at 20°C).

(2) One hundred and ten gallons of cleaning material per year on a 12-month rolling basis are excluded from the requirements of this subdivision provided that the use and quantity of the cleaning material excluded from the requirements are recorded in accordance with section 234.7 of this Part.

(3) The projected use of any new cleaning material products must demonstrate compliance with 6 NYCRR Part 234 and satisfy any applicable permit modification requirements prior to use.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: CLEANING MATERIAL

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 70 grams per liter

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 7: Compliance Demonstration
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 234.3 (d) (1)

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

- (1) An offset lithographic printing process that uses fountain solutions containing VOC shall satisfy the following criteria:

(ii) For sheet-fed offset lithographic printing processes:

(a) the fountain solution as applied contains no more than five percent alcohol by weight or equivalent;

(b) the fountain solution as applied contains no more than 8.5 percent alcohol by weight when the fountain solution is refrigerated to less than 60°F or 15.5°C; or

(c) the fountain solution as applied contains no more than five percent alcohol substitute by weight and no alcohol.

(iii) For cold-set web offset lithographic printing presses the fountain solution as applied contains no more than five percent alcohol substitute by weight and no alcohol.

(2) Sheet-fed offset lithographic presses with a sheet size of 11 inches by 17 inches or smaller or any press with a fountain solution reservoir of less than one gallon are not subject to the requirements of this subdivision.

(3) The projected use of any new fountain solution products must demonstrate compliance with 6 NYCRR Part 6 and satisfy any applicable permit modification

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requirements prior to use.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: ALCOHOL

Upper Permit Limit: 5 percent alcohol by weight

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 234.5

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity 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 a coating, ink or adhesive is to be applied to a substrate.

This prohibition shall not apply to the following:

(1) Ink, coating, or adhesive used in printing processes where control equipment has been installed to demonstrate compliance with this Part; or

(2) Ink, coating, or adhesive used in printing processes that have been granted variances for reasons of technological and economic feasibility per section 234.3(f) of this Part.

A person selling an ink, coating, or adhesive used in a printing process subject to this Part must, upon request, provide the buyer with certification of the VOC content of the coating, ink or adhesive supplied.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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Condition 9: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 234.6

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

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

Item 9.2:

Item 9.2. Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Type:

An owner or operator of a facility subject to this Part shall not:

- (a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;
 - (b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;
 - (c) Use open containers to store, dispose or dispense ink, coating or adhesive 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, coating or adhesive to a substrate.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 234.7

Emission Unit: 2-PRINT

Item 10.2:

Item 10.2: Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Purchase, use, and production records of ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material must be maintained in a format acceptable to the department, and upon request, submitted to the department.

Any other information required to determine compliance with this Part must be provided to the department in an acceptable format. Records must be maintained at the facility for five years.

The results of an analysis or other procedure used to establish compliance with this Part must be provided to the department. Department representatives shall be permitted, during reasonable business hours, to obtain ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 234.8

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A person shall not cause or allow emissions having an average opacity during any six consecutive minutes of 10 percent or greater from any emission source subject to Part 234 – Graphic Arts, except for the emission of uncombined water, at any time. NYSDEC reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The Facility shall immediately investigate any instance where there is cause to believe that visible emissions

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above those that are normal and in compliance are occurring or have occurred. Normal operation of printing presses does not result in any visible emissions.

If visible emissions are observed above those that are normal during anytime associated equipment is operating, the Facility shall notify NYSDEC in writing (electronic or equivalent method) as soon as possible during normal working hours, but not later than two working days after visible emissions were observed. The Facility shall determine the cause of any instance where there are visible emissions other than condensing moisture or steam, make the necessary correction, and verify that the visible emissions problem has been corrected.

Records of visible emissions observations, investigations and corrective actions shall be kept on-site in a bound logbook or an equivalent method, including electronic media. These records shall include the date, time, name of observer, emission point information, weather conditions and a description of the observations (steam, visible emissions, etc.). These records shall be kept on-site for a period of 5 years and be readily available upon request from a NYSDEC representative.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 12: Compliance Demonstration
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 228-2.4 (a)

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

A facility that uses a commercial or industrial adhesive, sealant, adhesive/sealant primer, shall not exceed the VOC content limits specified in Table 1 of Part 228-2.4. For adhesives applied to the listed substrates in Table 1, the

respective VOC content limits apply as follows:

- (1) If an adhesive is subject to a specific usage VOC content limit in Table 1, the specific usage limit is applicable rather than an adhesive-to-listed-substrate limit; and
 - (2) If an adhesive is used to bond dissimilar substrates together, the applicable substrates category with the highest VOC content shall be the limit for such

The Facility utilizes a hot melt adhesive to glue the edges of cardboard cartons. In accordance with 6 NYCRR Part 228-2, Table 1 for "Contact Bond Adhesives", the corresponding VOC content limit is 250 grams per liter (g/l), as-applied. Compliance with this limit is demonstrated through a Method 24 analysis. If the Facility anticipates the use of any new products in this process it will be required to demonstrate compliance with Subpart 228 and satisfy any applicable permit modification requirements prior to use.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: ADHESIVE

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 250 grams per liter

Reference Test Method: Method 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 13: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (1)

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

- (1) The concentration of VOC in all surface preparation solvents used with adhesive operations shall be less than

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70 grams per liter.

(2) The projected use of any new surface preparation solvent in this process must demonstrate compliance with Subpart 228 and satisfy any applicable permit modification requirements prior to use.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: CLEANING MATERIAL

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 70 grams per liter

Reference Test Method: Method 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 14: Compliance Demonstration
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (3)

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

(1) Except as provided by paragraph (4) of this section, the composite vapor pressure in all cleanup solvents used with adhesive operations shall be less than 45 mm Hg at 20°C.

(2) The projected use of any new surface preparation solvent in this process must demonstrate compliance with Subpart 228 and satisfy any applicable permit modification requirements prior to use.

(3) The composite vapor pressure of organic compounds in cleaning materials shall be determined by quantifying the amount of each compound in the blend using gas chromatographic analysis ASTM E 260-96 (2006) for organics and ASTM D3792-05 for water content, as applicable, and following the equation in 6 NYCRR Part 228-2.6(e).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

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Process Material: CLEANING MATERIAL

Parameter Monitored: COMPOSITE VAPOR PRESSURE

Upper Permit Limit: 45 millimeters of mercury

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGEAveraging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 15: Compliance Demonstration
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (4)****Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

When performing the removal of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment, the facility owner or operator must:

1. use an enclosed cleaning system, or an equivalent cleaning system as determined by the applicable test method identified in 6 NYCRR Part 228-2.6(h);
2. use a solvent with a VOC content less than or equal to 70 grams per liter; and
3. soak all parts containing dried adhesive in a solvent with a composite vapor pressure, excluding water and exempt compounds, less than or equal to 9.5 mm Hg at 20 degrees Celsius. The solvent and any soaking parts must be kept in a closed container at all times except when adding or removing parts from the container.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 70 grams per liter

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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Facility DEC ID: 9140200808

DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 228-2.4 (d)

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Work practices shall be employed at facilities where the total actual VOC emissions from all industrial adhesive application processes, including related cleaning activities, equal or exceed three tons in a 12-month rolling period, before consideration of emission control equipment. Work practices shall include:

(1) the following types of application equipment, with the use of low-VOC adhesives or adhesive primers:
electrostatic spray; HVLP spray; flow coat; roll coat or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application; dip coat (including electrodeposition); airless spray; air-assisted airless spray; any other adhesive application method, subject to Department approval, capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spraying;

(2) the following work practices for storage, mixing operations, and handling operations for adhesives, thinners, and adhesive-related waste materials that:

(i) store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers;

(ii) ensure that mixing and storage containers used for

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VOC-containing adhesives, adhesive primers, and process related waste materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing adhesives, adhesive primers, and process related waste materials; and

(iv) convey VOC-containing adhesives, adhesive primers, and process related waste materials from one location to another in closed containers or pipes.

(3) the following work practices to reduce VOC emissions from cleaning materials used in industrial adhesive application processes that:

(i) store all VOC-containing cleaning materials and used shop towels in closed containers;

(ii) ensure that storage containers used for VOC-containing materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing cleaning materials;

(iv) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

(v) minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

**Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION**

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 228-2.5 (a)

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

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Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility using products subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) shall maintain records demonstrating compliance with the VOC content limits, including, but not limited to, the following information:

- (1) a list of each commercial and industrial adhesive, sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at the facility;
- (2) identification of each product by product name and description;
- (3) the VOC content of each product as supplied;
- (4) the mix ratio of any catalysts, reducers or other components used;
- (5) the final VOC content or vapor pressure, as applied; and
- (6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used at the facility.

These records shall be maintained for five years from the date such record is created and shall be made available to NYSDEC within 90 days of a request per Subpart 228-2.5(c).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

- (1) an emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) the equipment at the facility was being properly operated and maintained;
- (3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) the facility owner 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 any corrective actions taken.

(b) In any enforcement proceeding, the facility owner 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 malfunction provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance

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with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: **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 only enforceable.

**Condition 18: Contaminant List
Effective for entire length of Permit**

Applicable State Requirement:ECL 19-0301

Item 18.1:

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

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 0NY998-00-0
Name: VOC

**Condition 19: Malfunctions and Start-up/Shutdown Activities
Effective for entire length of Permit**

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Applicable State Requirement:6 NYCRR 201-1.4**Item 19.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 20: Emission Unit Definition
Effective for entire length of Permit****Applicable State Requirement:6 NYCRR Subpart 201-5****Item 20.1:**

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

Emission Unit: 2-PRINT

Emission Unit Description:

This emission unit consists of five (5) offset lithographic printing presses [emission sources HDB10, HDB11, HB12R, HB14R, and HB16R], two (2) C&P letterpress machines [emission sources CPLP1-2], and nine (9) kluge letterpress units [emission sources KLGF1-7, and KLGI1-2].

Building(s): Main

Item 20.2:

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

Emission Unit: 4-MISCL

Emission Unit Description:

This emission unit consists of 11 gluing machines, denoted as emission sources GLU01 to 11, that fold cardboard cartons and apply various adhesives on folded edges to maintain shape.

Building(s): Main

Condition 21: **Renewal deadlines for state facility permits**
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 201-5.2 (c)

Item 21.1:

The owner or operator of a facility having an issued state facility 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.

Condition 22: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 201-5.3 (c)

Item 22.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
700 Delaware Ave..

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Buffalo, N.Y. 14209

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 23: Air pollution prohibited
Effective for entire length of Permit****Applicable State Requirement: 6 NYCRR 211.1****Item 23.1:**

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.

****** Emission Unit Level ********Condition 24: Emission Point Definition By Emission Unit
Effective for entire length of Permit****Applicable State Requirement: 6 NYCRR Subpart 201-5****Item 24.1:**

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

Emission Unit: 2-PRINT

Emission Point: 00028

Height (ft.): 23 Diameter (in.): 15
NYTMN (km.): 4762.06 NYTME (km.): 183.742 Building: Main

Emission Point: 00035

Height (ft.): 30 Diameter (in.): 12
NYTMN (km.): 4762.093 NYTME (km.): 183.729 Building: Main

Emission Point: 00036

Height (ft.): 30 Diameter (in.): 12
NYTMN (km.): 4762.093 NYTME (km.): 183.718 Building: Main

Emission Point: 00037

Height (ft.): 30 Diameter (in.): 4
NYTMN (km.): 4762.062 NYTME (km.): 183.712 Building: Main

Emission Point: 00038

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Height (ft.): 30 Diameter (in.): 12
NYTMN (km.): 4762.062 NYTME (km.): 183.724 Building: Main

Emission Point: 0028A
Height (ft.): 23 Diameter (in.): 15
NYTMN (km.): 4762.055 NYTME (km.): 183.742 Building: Main

Emission Point: 0028B
Height (ft.): 23 Diameter (in.): 15
NYTMN (km.): 4762.052 NYTME (km.): 183.742 Building: Main

Emission Point: 0028C
Height (ft.): 23 Diameter (in.): 15
NYTMN (km.): 4762.05 NYTME (km.): 183.742 Building: Main

**Condition 25: Process Definition By Emission Unit
Effective for entire length of Permit**

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 25.1:

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

Emission Unit: 2-PRINT

Process: 002 Source Classification Code: 4-05-004-03

Process Description:

Process 002 involves the application of inks using offset lithographic printing presses. Five (5) Heidelberg press units are used in the high-speed printing department. The printing process involves the application of inks to rollers, which are then rolled over screens to apply the inks to the paper in specific patterns. Cleaning materials and fountain solutions that contain VOC are also used in conjunction with VOC containing inks. The HDB10 printing press can apply ultraviolet (UV) cured inks/coatings in addition to solvent/water-based inks/coatings, while all other printing presses can only apply non-UV cured inks/coatings.

Emission Source/Control: HB12R - Process

Emission Source/Control: HB14R - Process

Emission Source/Control: HB16R - Process

Emission Source/Control: HDB10 - Process

Emission Source/Control: HDB11 - Process

Item 25.2:

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

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Facility DEC ID: 9140200808

Emission Unit: 2-PRINT

Process: 004

Source Classification Code: 4-05-002-05

Process Description:

Process 004 involves the application of inks to paper napkins using two (2) C&P letterpress machines. The process involves ink application to a plate, from which rolls collect ink. The rolls then apply the collected ink to napkins. The napkin is inked on a design completing the final product. Materials in use in this process include inks and cleaning solvents.

Emission Source/Control: CPLP1 - Process

Emission Source/Control: CPLP2 - Process

Item 25.3:

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

Emission Unit: 2-PRINT

Process: 005

Source Classification Code: 4-05-002-05

Process Description:

Process 005 involves the application of inks to paper sheets and foil using kluge units which are a type of letterpress. The two types of Kluge Units in use include Ink Units and Foil Units. The Kluge Units utilize the platen press design. The platen moves by cam action from a horizontal open position where the sheet is fed to a closed vertical position where the impression is made. There are two (2) Kluge Ink Units and seven (7) Kluge Foil Units.

Emission Source/Control: KLGF1 - Process

Emission Source/Control: KLGF2 - Process

Emission Source/Control: KLGF3 - Process

Emission Source/Control: KLGF4 - Process

Emission Source/Control: KLGF5 - Process

Emission Source/Control: KLGF6 - Process

Emission Source/Control: KLGF7 - Process

Emission Source/Control: KLGI1 - Process

Emission Source/Control: KLGI2 - Process

Item 25.4:

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

Permit ID: 9-1402-00808/00003**Facility DEC ID: 9140200808**

Emission Unit: 4-MISCL

Process: 007

Source Classification Code: 4-02-007-01

Process Description:

Process 007 involves the application of adhesives to cardboard cartons using eleven (11) gluing machines. The machines fold and glue the edges on the cartons using various adhesives. As the adhesives dry, the cartons maintain their shape.

Emission Source/Control: GLU01 - Process

Emission Source/Control: GLU02 - Process

Emission Source/Control: GLU03 - Process

Emission Source/Control: GLU04 - Process

Emission Source/Control: GLU05 - Process

Emission Source/Control: GLU06 - Process

Emission Source/Control: GLU07 - Process

Emission Source/Control: GLU08 - Process

Emission Source/Control: GLU09 - Process

Emission Source/Control: GLU10 - Process

Emission Source/Control: GLU11 - Process

Permit ID: 9-1402-00808/00003

Facility DEC ID: 9140200808