

Facility DEC ID: 9142200093

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1422-00093/00035
Mod 0 Effective Date: 10/25/2016 Expiration Date: 10/24/2021
Mod 1 Effective Date: 10/25/2016 Expiration Date: 10/24/2021
Mod 2 Effective Date: 11/05/2020 Expiration Date: 10/24/2021

Permit Issued To: INTERNATIONAL IMAGING MATERIALS INC
310 COMMERCE DR
AMHERST, NY 14228-2303

Contact: JEFFREY A WITTLINGER
INTERNATIONAL IMAGING
310 COMMERCE DR
BUFFALO, NY 14228
(716) 691-6333

Facility: INTERNATIONAL IMAGING
310 COMMERCE DR
AMHERST, NY 14228

Contact: JEFFREY A WITTLINGER
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BUFFALO, NY 14228
(716) 691-6333

Description:

IIMAK is a manufacturer of thermal transfer ribbons. IIMAK coats polyester film with wax and solvent-based backings and inks for use in bar code applicators, color printers and facsimile machines. The solvent-based coatings are manufactured on site and coating machines are used to apply the coatings to the films.

This permit modification (Mod 2) adds a new coating line, MSC-6 (designated emission source 00312) to the permit. This modification also adds the requirements of 40 CFR 63 JJJJ National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating to the permit. Under 40 CFR 63 JJJJ, organic hazardous air pollutants (HAP) emissions must be reduced by 95 percent by capture and control equipment.

The facility consists of five emission units:

X-OXDZR: This emission unit includes six multi-station coaters (MSC-1 – MSC-6), identified as emission sources 00221, 00222, 00224, 00271, 00311, and 00312, respectively. Also, included in the emission unit are: Plant 1 coaters, parts washers, slitting machines, oxidizers, and the toluene recovery system (TRS) located within Plant 1 and Plant 2. The TRS has the

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capability to receive and treat approximately half of the facility-wide emissions from the coaters.

1-CBS01: IIMAK has the following chemical bulk storage tanks: (1) 15,000 gallon storage tank for methyl ethyl ketone (MEK); (2) 10,000 gallon storage tank for either toluene, MEK, 2-propanone, or cyclohexanone; and (3) 10,000 gallon storage tank for toluene. These tanks are located in a vault below Plant #2 and are each vented to atmosphere. The solvents are used in the manufacturing of thermal transfer ribbon inks.

1-BOILER: Two 24.5 mmBTU/hr natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying;

1-WEIGH: 2 weigh stations, where solid pigments, resins and waxes are weighed, mixed and melted. Dust collectors are employed as control devices; and

1-CORON: Polyester film is subjected to a corona treatment process that generates ozone. The two (2) corona treatment units are connected to coating machines MSC-1, and 89-3. The ozone is collected in hoods and vented to the roofs of Plant No. 1 & Plant No. 2.

The facility is separated into two plants, each of which accepted a volatile organic compounds (VOC) emission cap of less than 50 tons per year so that the newer of the two plants (Plant No.1) was not subject to 6 NYCRR Subpart 231-2 when it was constructed. The project encompassing the construction and operation of coating machine MSC-4 and the 60,000 cfm regenerative oxidizer, which is designated Oxidizer 4, was subject to 6NYCRR Subpart 231-2 New Source Review (NSR). The project permit, issued in 2002, imposed a VOC emission cap of less than 40 tons per year on the new emission source, coating machine MSC-4. Also, a subsequent project encompassed the construction and operation of coating machine MSC-5, which is designated as emission source 00311, was subject to NSR. The project permit, issued in 2011, imposed a VOC emission cap of less than 40 tons per year on the new emission source (coating machine MSC-5, designated emission source 00311). IIMAK is required to annually certify continuous compliance with the four VOC emission caps which all remain in effect.

The facility meets the 95 percent control for organic HAP required by 40 CFR 63 JJJJ with the use of the TRS, oxidizers, and permanent total enclosures (PTE) around the coating machines. The efficiency of the control equipment is verified through performance testing. The most recent performance testing was completed on April 14, 2017. IIMAK must conduct a Method 204 test on the PTE equipped to emission source 00312, which will be constructed as of this permit modification (Mod 2), within 180 days of startup of the unit.

The facility meets the 6 NYCRR Subpart 228-1 VOC control requirements for Class D coatings by maintaining compliance with the JJJJ requirements, which are more stringent. The facility is also subject to the general housekeeping, recordkeeping, and preventative maintenance of Subpart 228-1.

Each continuous-roll coating machine is equipped with a PTE so that all of the VOC-containing emissions from the machines are piped to the oxidizers for destruction or to the TRS for toluene recovery. The oxidizers are required to maintain minimum operating temperatures as determined during destruction efficiency testing and according to the Compliance Assurance Monitoring (CAM) Plan prepared in accordance with 40CFR Part 64. IIMAK is required to keep records which document the amount of VOCs emitted on a 12-month rolling total basis.

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The TRS is designed and operated to adsorb organic vapors from the exhaust air collected from the multi-station coaters by passing the gas stream through two (2) of three (3) carbon beds at the same time. Each carbon bed has a maximum organic vapor adsorption capacity. The point at which the removal efficiency of the carbon begins to rapidly decrease is called the breakthrough point. The carbon beds are operated so that any one bed of the total system never reaches the breakthrough point. A hydrocarbon analyzer serves as a process control device on the TRS outlet, measuring toluene concentration at all times that the TRS is operated. Daily calibration is required. Monitoring for breakthrough on each operating bed will take place according to the CAM Plan. A data acquisition system collects the outlet concentrations at a rate of a minimum of four data points per hour, and calculates, records, and retains 1-hr averages.

Performance test(s) determining the removal efficiency of the TRS and determining the destruction efficiency of Oxidizers #2, 3, & 4 must be performed utilizing three 1-hr test runs using an approved federal testing method once every five years, based on the date of the previous test.

The facility's two 24.5 mmBTU/hr natural gas boilers produce steam and are subject to 40CFR60 Subpart Dc which requires fuel combustion records to be maintained and to the opacity limit per 6NYCRR Subpart 227-1.

Particulate emissions from the facility's weigh stations are subject to the opacity and particulate loading limits of 6NYCRR Part 212. Emissions are controlled by fabric filters and the efficacy of the filters is maintained by monitoring of the pressure drop across the filters.

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: MARK F PASSUITE
NYSDEC - REGION 9
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ___ / ___ / ___

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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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- 7 13 Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

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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 1-1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1-1.1:

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 1-1.2:

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 1-1.3:

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 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,

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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 1-2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 1-2.1:

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.

Item3.2:

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 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 2-1: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 2-1.1:

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.

Item2-1.2:

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

Item 2-1.3

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 1-3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

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Item 1-3.1:

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 1-3.2:

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 1-3.3:

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 5: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 5.1:

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

Item 5.2:

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: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 4.1:

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

Item 4.3:

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 1-4: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 1-4.1:

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

Item 1-4.3:

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

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submitted prior to actual transfer of ownership.

Condition 6: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 6.1:

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.

Condition 1-5: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-5.1:

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.

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Condition 7: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 7.1:

Submission of applications for permit modification or renewal are to be submitted to:
 NYSDEC Regional Permit Administrator
 Region 9 Headquarters
 Division of Environmental Permits

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270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: INTERNATIONAL IMAGING MATERIALS INC
310 COMMERCE DR
AMHERST, NY 14228-2303

Facility: INTERNATIONAL IMAGING
310 COMMERCE DR
AMHERST, NY 14228

Authorized Activity By Standard Industrial Classification Code:
3955 - CARBON PAPER AND INKED RIBBONS

Mod 0 Permit Effective Date: 10/25/2016

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Mod 1 Permit Effective Date: 10/25/2016

Permit Expiration Date: 10/24/2021

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- 8 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 9 2 6 NYCRR 201-6.4 (a) (7): Fees
- 9 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 9 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 10 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 12 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 14 7 6 NYCRR 202-2.1: Compliance Certification
- 14 2-1 6 NYCRR 202-2.5: Recordkeeping requirements
- 14 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 15 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 16 2-2 6 NYCRR 200.7: Maintenance of Equipment
- 16 10 6 NYCRR 200.7: Maintenance of Equipment
- 16 11 6 NYCRR 201-1.7: Recycling and Salvage
- 17 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 17 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 17 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 17 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 18 2-3 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 18 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 19 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 19 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 19 40 CFR Part 68: Accidental release provisions.
- 20 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 20 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 22 *24 6 NYCRR 201-7.1: Capping Monitoring Condition
- 23 *25 6 NYCRR 201-7.1: Capping Monitoring Condition
- 25 *26 6 NYCRR 201-7.1: Capping Monitoring Condition
- 27 *27 6 NYCRR 201-7.1: Capping Monitoring Condition
- 29 *28 6 NYCRR 201-7.1: Capping Monitoring Condition
- 31 2-4 6 NYCRR 211.2: Visible Emissions Limited
- 31 30 6 NYCRR 228-1.6 (d): Compliance Certification
- 32 2-5 40CFR 63.6(e), Subpart A: Compliance Certification
- 33 2-6 40CFR 63.6(e), Subpart A: Compliance Certification
- 35 2-7 40CFR 63.Tbl 2, Subpart JJJJ: Subpart A Requirements for Subpart JJJJ

Emission Unit Level

- 35 31 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 37 32 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=1-BOILR

- 42 33 6 NYCRR 227-1.3 (a): Compliance Certification
- 43 34 40CFR 60.48c(a), NSPS Subpart Dc: Compliance Certification
- 44 35 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Certification

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45 36 40CFR 60.48c(g)(2), NSPS Subpart Dc: Alternative Recordkeeping
 45 37 40CFR 60.48c(g)(3), NSPS Subpart Dc: Reporting and
 Recordkeeping Requirements

EU=1-CORON

46 2-8 6 NYCRR 212-2.3 (a): Compliance Certification

EU=1-WEIGH

46 39 6 NYCRR 212-1.6 (a): Compliance Certification

47 40 6 NYCRR 212-2.4 (b): Compliance Certification

EU=X-OXDZR

48 42 6 NYCRR 228-1.3 (a): Compliance Certification

49 43 6 NYCRR 228-1.3 (b) (1): Compliance Certification

50 44 6 NYCRR 228-1.3 (c): Compliance Certification

51 45 6 NYCRR 228-1.3 (d): Compliance Certification

52 46 6 NYCRR 228-1.4 (d): Compliance Certification

53 2-9 6 NYCRR 228-1.5 (c): Compliance Certification

54 48 6 NYCRR 228-1.5 (c): Compliance Certification

55 2-10 40CFR 63.3320(b)(1), Subpart JJJJ: Compliance Certification

55 2-11 40CFR 63.3350(f), Subpart JJJJ: Compliance Certification

56 2-12 40CFR 63.3400(c)(2), Subpart JJJJ: Compliance Certification

EU=X-OXDZR,Proc=OXB

58 2-13 40CFR 63.3360(e), Subpart JJJJ: Compliance Certification

EU=X-OXDZR,Proc=OXB,ES=0002A

60 2-14 40CFR 63.3321(a), Subpart JJJJ: Compliance Certification

EU=X-OXDZR,Proc=OXB,ES=0003A

61 2-15 40CFR 63.3321(a), Subpart JJJJ: Compliance Certification

EU=X-OXDZR,Proc=OXB,ES=0004A

62 2-16 40CFR 63.3321(a), Subpart JJJJ: Compliance Certification

EU=X-OXDZR,Proc=TRS,ES=00321

63 2-17 6 NYCRR 228-1.5 (c): Compliance Certification

63 2-18 6 NYCRR 228-1.5 (c): Compliance Certification

65 2-19 40CFR 63.3350(d)(1), Subpart JJJJ: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

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69 54 ECL 19-0301: Contaminant List

69 55 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

70 29 6 NYCRR 211.1: Air pollution prohibited

NOTE: * preceding the condition number indicates capping.

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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 2/Mod 2/FINAL

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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: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 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 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (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 C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (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 D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (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 E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (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

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reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (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 G: Property Rights - 6 NYCRR 201-6.4 (a) (6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: Severability - 6 NYCRR 201-6.4 (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 I: Permit Shield - 6 NYCRR 201-6.4 (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

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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 J: Reopening for Cause - 6 NYCRR 201-6.4 (i)

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of 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 the 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 section 201- 6.6 of this Subpart.

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

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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

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)

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 between the dates of 10/25/2016 and 10/24/2021**

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

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contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:6 NYCRR 201-6.4 (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 72-0303.

Condition 3: Recordkeeping and Reporting of Compliance Monitoring
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:6 NYCRR 201-6.4 (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 201-6.2 of Part 201.

Condition 4: Records of Monitoring, Sampling, and Measurement
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:6 NYCRR 201-6.4 (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

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reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 201-6.4 (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,

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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 201-6.2(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

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report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)

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:

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

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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 annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section
USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
NYSDEC Region 9 Headquarters
270 Michigan Avenue
Buffalo, NY 14203-2915

The address for the BQA is as follows:

NYSDEC

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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 1/30/2017.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
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.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 2-1: Recordkeeping requirements
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 2-1.1:
(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: Recordkeeping requirements
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:6 NYCRR 202-2.5

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Item 8.1:

(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 9: Open Fires - Prohibitions**Effective between the dates of 10/25/2016 and 10/24/2021****Applicable Federal Requirement: 6 NYCRR 215.2****Item 9.1:**

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

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to

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burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**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 2-2: Maintenance of Equipment
Effective between the dates of 11/05/2020 and 10/24/2021**

Applicable Federal Requirement:6 NYCRR 200.7

Item 2-2.1:

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.

**Condition 10: Maintenance of Equipment
Effective between the dates of 10/25/2016 and 10/24/2021**

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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.

**Condition 11: Recycling and Salvage
Effective between the dates of 10/25/2016 and 10/24/2021**

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Applicable Federal Requirement:6 NYCRR 201-1.7**Item 11.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air**Effective between the dates of 10/25/2016 and 10/24/2021****Applicable Federal Requirement:6 NYCRR 201-1.8****Item 12.1:**

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.

Condition 13: Exempt Sources - Proof of Eligibility**Effective between the dates of 10/25/2016 and 10/24/2021****Applicable Federal Requirement:6 NYCRR 201-3.2 (a)****Item 13.1:**

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 14: Trivial Sources - Proof of Eligibility**Effective between the dates of 10/25/2016 and 10/24/2021****Applicable Federal Requirement:6 NYCRR 201-3.3 (a)****Item 14.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 15: Requirement to Provide Information**Effective between the dates of 10/25/2016 and 10/24/2021****Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)****Item 15.1:**

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

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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 2-3: Right to Inspect

Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 2-3.1:

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: Right to Inspect

Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 16.1:

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.

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Condition 17: Off Permit Changes

Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 201-6.4 (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 201-6.4 shall not apply to any change made pursuant to this paragraph.

Condition 18: Required Emissions Tests

Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 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.

Condition 19: Accidental release provisions.

Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 40 CFR Part 68

Item 19.1:

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;

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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 20: Recycling and Emissions Reduction
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:40CFR 82, Subpart F

Item 20.1:

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 21: Emission Unit Definition
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 21.1(From Mod 2):

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

Emission Unit: 1-BOILR

Emission Unit Description:

Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.

Building(s): 2

Item 21.2(From Mod 2):

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

Emission Unit: 1-CBS01

Emission Unit Description:

IIMAK has the following chemical bulk storage tanks: (1)
 one 15,000 gallon storage tank for methyl ethyl ketone

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(MEK); (2) one 10,000 gallon storage tank for either toluene, MEK, 2-propanone, or cyclohexanone; and (3) one 10,000 gallon storage tank for toluene. These tanks are located in a vault below Plant #2, and are each vented to atmosphere. The solvents are used in the manufacturing of thermal transfer ribbon inks.

Building(s): 2

Item 21.3(From Mod 2):

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

Emission Unit: 1-CORON

Emission Unit Description:

Polyester film is subjected to a corona treatment process that generates ozone. The two (2) corona treatment units are connected to coating machines MSC-1, and 89-3. The ozone is collected in hoods and vented to the roofs of Plant No. 1 & Plant No. 2 in 0.667 foot diameter pipes at 1500 CFM.

Building(s): 1
2**Item 21.4(From Mod 2):**

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

Emission Unit: X-OXDZR

Emission Unit Description:

This emission unit includes all coating machines, parts washers, slitting machines, oxidizers, and the toluene recovery system (TRS) located within Plant 1 and Plant 2. Emissions from Plant 1 are routed to Oxidizer 4 with Oxidizer 2 as the backup unit, and emissions from Plant 2 sources are routed to either Oxidizer 4 or the TRS, with Oxidizer 3 as the backup unit. The TRS has the capability to receive and treat approximately half of the facility-wide emissions.

Building(s): 1
2**Item 21.5(From Mod 0):**

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

Emission Unit: 1-WEIGH

Emission Unit Description:

A mixture of solid pigment resins and waxes are weighed at weigh stations and are then mixed and melted at the mix tanks. Dust from the weighing process is collected into dust collectors.

Building(s): 1

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Condition 22: Progress Reports Due Semiannually
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 201-6.4 (d) (4)

Item 22.1:

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 24: Capping Monitoring Condition
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 24.1:

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 Subpart 231-2

Item 24.2:

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

Item 24.3:

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 24.4:

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 24.5:

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

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201 and of the Act.

Item 24.6:

The Compliance Certification activity will be performed for the Facility.

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

Item 24.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will track usage/consumption and maintain all necessary records showing the quantity of all volatile organic compound (VOC) containing materials used at the facility. IIMAK will submit an annual Emission Cap Report which details, for each month, the total annual VOC emission rate calculated on a rolling, monthly basis for each of the facility's three individual emission caps. The annual report will be due 30 days after the end of each calendar year and must be submitted to the following addresses:

NYSDEC
Regional Air Pollution Control Engineer
270 Michigan Avenue
Buffalo, New York 14203-2999

NYSDEC
Bureau of Stationary Sources
625 Broadway
Albany, New York 12233-3258

The records will include the VOC content of the materials and be based on verifiable data. IIMAK will maintain purchase orders and/or invoices of the VOC containing materials to confirm the general accuracy of the records. These records shall be kept on site for a minimum of five years and will be made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 25: Capping Monitoring Condition
Effective between the dates of 10/25/2016 and 10/24/2021

Permit ID: 9-1422-00093/00035

Facility DEC ID: 9142200093

Applicable Federal Requirement:6 NYCRR 201-7.1**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:

6 NYCRR Subpart 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: 0NY998-00-0 VOC

Item 25.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

IIMAK will not exceed an emission rate of 39 tons of VOCs per 12 month period for coating machine MSC-5, which is identified as emission source 00311. Compliance will be determined by summing the individual monthly emissions

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during any consecutive 12 month period using the following formula:

$$\text{VOC(MSC-5)} = [\text{VOC(es00311)} \times (1-\text{DE})]$$

where,

VOC(es00311) = VOC emissions generated by emission source 00311, otherwise known as MSC-5 coater.

DE = destruction efficiency of specific control device as measured during performance testing.

VOC(MSC-5) = total VOC emissions generated by the MSC-5 coater which were released to the environment.

The facility shall submit to the Department an annual emission cap report 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.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 39 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 26: Capping Monitoring Condition
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 26.1:

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 Subpart 231-2

Item 26.2:

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

Item 26.3:

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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 26.4:

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 26.5:

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 26.6:

The Compliance Certification activity will be performed for the Facility.

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

Item 26.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
 OPERATIONS

Monitoring Description:

IIMAK will not exceed an emission rate of 49 tons of VOCs per 12 month period for emission units 1-CBS01 and for coating machines MSC-1, MSC-2, & MSC-3 which are identified as emission sources 00221, 00222, 00224, respectively, and the Renzmann parts washers which is identified as emission source 00223. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

$$\text{VOC}(1\text{-CBS01, MSC-1, MSC-2, MSC-3, Renzmann}) = [\text{VOC}(\text{es}) \times (1\text{-DE})]$$

where,

VOC(es) = VOC emissions generated by each emission source associated with each specific oxidizer. This value is determined by proportionally distributing the facility's total solvent usage based on coating production.

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DE = destruction efficiency of specific control device as measured during performance testing.

VOC(1-CBS01, MSC-1, MSC-2, MSC-3, Renzmann) = total VOC emissions generated by emission unit 1-CBS01, the MSC-1, MSC-2, & MSC-3 coaters, and the Renzmann parts washers, which were released to the environment.

The facility shall submit to the Department an annual emission cap report 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.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 49 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 27: Capping Monitoring Condition
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 27.1:

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 Subpart 231-2

Item 27.2:

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

Item 27.3:

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 27.4:

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

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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 27.5:

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 27.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 27.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IIMAK will not exceed an emission rate of 39 tons of VOCs per 12 month period for coating machine MSC-4, which is identified as emission source 00271. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

$$\text{VOC(MSC-4)} = [\text{VOC(es00271)} \times (1-\text{DE})]$$

where,

VOC(es00271) = VOC emissions generated by emission source 00271, otherwise known as MSC-4 coater.

DE = destruction efficiency of specific control device as measured during performance testing.

VOC(MSC-4) = total VOC emissions generated by the MSC-4 coater which were released to the environment.

The facility shall submit to the Department an annual emission cap report 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.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
 Process Material: COATING

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Parameter Monitored: VOC
Upper Permit Limit: 39 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due every 6 calendar month(s).

Condition 28: Capping Monitoring Condition
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 28.1:

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 Subpart 231-2

Item 28.2:

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

Item 28.3:

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 28.4:

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 28.5:

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 28.6:

The Compliance Certification activity will be performed for the Facility.

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

Permit ID: 9-1422-00093/00035

Facility DEC ID: 9142200093

Item 28.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IIMAK will not exceed an emission rate of 49 tons of VOCs per 12 month period for Plant #1 which consists of emission unit 1-WEIGH and these emission sources (with identifiers in parentheses): WEB1 (00004), WEB2 (00005), OTC3N (00007), OTC3S (00006), WEB3 (00011), WEB4 (00010), ME4 (00013), 89-1 (00009), 86-1 (00003), 84-1 (00017), WEB6 (00016), WEB5 (00015), 89-2 (00012), 89-3 (00002), 83-1 (00001), and Slitter (00026). Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

$$\text{VOC (Plant 1)} = [\text{VOC(es)} \times (1-\text{DE})]$$

where,

VOC(es) = VOC emissions generated by each emission source associated with each specific oxidizer. This value is determined by proportionally distributing the facility's total solvent usage based on coating production.

DE = destruction efficiency of specific oxidizer as measured during performance testing.

VOC(Plant 1) = total VOC emissions generated by Plant 1 emission sources which were released to the environment.

The facility shall submit to the Department an annual emission cap report 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.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 49 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

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Condition 2-4: Visible Emissions Limited
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 211.2

Item 2-4.1:

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 30: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 228-1.6 (d)

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

When an owner and/or operator of a coating line utilizes control equipment to comply with the provisions of this Part, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

(1) The overall removal efficiency may be made by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment. Methods provided in 6 NYCRR Part 228-1.6(a) or (b) must be used.

(2) For any control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment. The approved VOC CE test methods are contained in the table in 6 NYCRR Part 228-1.6(d)(2). Test methods 204 through 204F (M204 - M204F) are included in appendix M of 40 CFR part 51 (see table 1, section 200.9 of this Title). The approved test methods for determining the efficiency of the control equipment are listed in 6 NYCRR Part 228-1.6(e).

(3) Alternative CE protocols and test methods may be allowed if the data quality objective approach or lower confidence limit approach requirements are met in conjunction with the additional criteria set forth in the

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Emission Unit: X-OXDZR Process: OXB	Emission Source: 00224
Emission Unit: X-OXDZR Process: OXB	Emission Source: 00271
Emission Unit: X-OXDZR Process: OXB	Emission Source: 00311
Emission Unit: X-OXDZR Process: TRS	Emission Source: 00221
Emission Unit: X-OXDZR Process: TRS	Emission Source: 00222
Emission Unit: X-OXDZR Process: TRS	Emission Source: 00224
Emission Unit: X-OXDZR Process: TRS	Emission Source: 00271
Emission Unit: X-OXDZR Process: TRS	Emission Source: 00311

Item 2-6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK has instituted a Startup Shutdown Malfunction (SSM) Plan for coating lines MSC-1 through MSC-5 in case of control technology (oxidizer or toluene recovery system (TRS)) malfunction. The Plan includes the following actions:

1. IIMAK will keep an inventory of spare parts for the control technologies and the associated fans and drives. As parts are used, new parts will be ordered to maintain replacement parts for critical components that could malfunction or have historically malfunctioned.
2. IIMAK personnel will notify maintenance staff via plant-wide page at the time that a control technology (oxidizer or TRS) indicates signs of a malfunction.
3. Maintenance staff will immediately respond to any control technology malfunctions and dedicate the resources necessary to repair the units, in house, in the shortest period of time practical.
4. In the event that the malfunction is due to a utility

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provider or a malfunction of a component itself that cannot be repaired in house, IIMAK will immediately notify and mobilize the appropriate outside agencies to correct the malfunction.

5. Once a control device malfunction is identified that will extend beyond a one hour time period, IIMAK production supervisors will initiate the start-up of one of the oxidizer back-up systems. Note that the TRS automatically switches to Oxidizer No. 4 which serves as the back-up system for the TRS.

6. If maintenance has not corrected the malfunction within 4 hours of the time of the malfunction event or prior to the back-up oxidizer reaching its' operational temperature, the coaters will either be rerouted to the appropriate backup unit or shut down. Note that a four (4) hour time period is equivalent to the duration of the longest running product roll.

7. IIMAK may not load a new product roll unless emissions are routed to an active emission control device.

8. VOC emissions will be quantified, via mass balance calculations, during the malfunction period and accounted for in monthly emission totals.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

**Condition 2-7: Subpart A Requirements for Subpart JJJJ
Effective between the dates of 11/05/2020 and 10/24/2021**

Applicable Federal Requirement:40CFR 63.Tbl 2, Subpart JJJJ

Item 2-7.1:

The applicant must comply with the requirements of 40 CFR 63 Subpart A, as specified in Table 2 of 40 CFR 63 Subpart JJJJ.

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

**Condition 31: Emission Point Definition By Emission Unit
Effective between the dates of 10/25/2016 and 10/24/2021**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Permit ID: 9-1422-00093/00035

Facility DEC ID: 9142200093

Item 31.1(From Mod 2):

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

Emission Unit: 1-BOILR

Emission Point: 00020

Height (ft.): 17 Diameter (in.): 27
 NYTMN (km.): 4771.077 NYTME (km.): 189.708 Building: 2

Emission Point: 00021

Height (ft.): 17 Diameter (in.): 27
 NYTMN (km.): 4771.071 NYTME (km.): 189.707 Building: 2

Item 31.2(From Mod 2):

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

Emission Unit: 1-CBS01

Emission Point: 00023

Height (ft.): 25 Diameter (in.): 4
 NYTMN (km.): 4771.11 NYTME (km.): 189.754 Building: 2

Emission Point: 00024

Height (ft.): 25 Diameter (in.): 4
 NYTMN (km.): 4771.1 NYTME (km.): 189.756 Building: 2

Emission Point: 00025

Height (ft.): 25 Diameter (in.): 4
 NYTMN (km.): 4771.104 NYTME (km.): 189.753 Building: 2

Item 31.3(From Mod 2):

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

Emission Unit: 1-CORON

Emission Point: 00028

Height (ft.): 40 Diameter (in.): 8
 NYTMN (km.): 4771.126 NYTME (km.): 189.692 Building: 2

Emission Point: 00030

Height (ft.): 26 Diameter (in.): 8
 NYTMN (km.): 4771.096 NYTME (km.): 189.692 Building: 1

Item 31.4(From Mod 2):

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

Emission Unit: X-OXDZR

Emission Point: 00008

Height (ft.): 35 Diameter (in.): 38
 NYTMN (km.): 4771.127 NYTME (km.): 189.756 Building: 1

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Facility DEC ID: 9142200093

Emission Point: 00014
 Height (ft.): 35 Diameter (in.): 45
 NYTMN (km.): 4771.121 NYTME (km.): 189.755 Building: 1

Emission Point: 00022
 Height (ft.): 44 Diameter (in.): 65
 NYTMN (km.): 4771.127 NYTME (km.): 189.761 Building: 2

Emission Point: 00027
 Height (ft.): 44 Diameter (in.): 65
 NYTMN (km.): 4771.119 NYTME (km.): 189.763 Building: 2

Emission Point: 0032A
 Height (ft.): 22 Diameter (in.): 26
 NYTMN (km.): 4771.08 NYTME (km.): 189.78 Building: 2

Emission Point: 0032B
 Height (ft.): 22 Diameter (in.): 26
 NYTMN (km.): 4771.08 NYTME (km.): 189.78 Building: 2

Emission Point: 0032C
 Height (ft.): 22 Diameter (in.): 26
 NYTMN (km.): 4771.08 NYTME (km.): 189.78 Building: 2

Item 31.5(From Mod 0):

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

Emission Unit: 1-CORON

Emission Point: 00029
 Height (ft.): 40 Diameter (in.): 8
 NYTMN (km.): 4771.114 NYTME (km.): 189.692 Building: 2

Item 31.6(From Mod 0):

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

Emission Unit: 1-WEIGH

Emission Point: 00018
 Height (ft.): 35 Diameter (in.): 12
 NYTMN (km.): 4771.047 NYTME (km.): 189.694 Building: 1

Emission Point: 00019
 Height (ft.): 35 Diameter (in.): 12
 NYTMN (km.): 4771.046 NYTME (km.): 189.701 Building: 1

Condition 32: Process Definition By Emission Unit
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 32.1(From Mod 2):

Permit ID: 9-1422-00093/00035

Facility DEC ID: 9142200093

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

Emission Unit: 1-BOILR
 Process: B20 Source Classification Code: 1-03-006-02
 Process Description:
 Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.
 Emission Source/Control: 00020 - Combustion
 Design Capacity: 24.5 million Btu per hour

Item 32.2(From Mod 2):

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

Emission Unit: 1-BOILR
 Process: B21 Source Classification Code: 1-03-006-02
 Process Description:
 Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.
 Emission Source/Control: 00021 - Combustion
 Design Capacity: 24.5 million Btu per hour

Item 32.3(From Mod 2):

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

Emission Unit: 1-CBS01
 Process: T01 Source Classification Code: 4-05-002-05
 Process Description:
 This process consists of three (3) tanks contained within a vault below Plant #2. Each are vented to atmosphere. The solvents are used in the manufacturing of thermal transfer ribbon inks.
 Emission Source/Control: 00023 - Process
 Design Capacity: 15,000 gallons
 Emission Source/Control: 00024 - Process
 Design Capacity: 10,000 gallons
 Emission Source/Control: 00025 - Process
 Design Capacity: 10,000 gallons

Item 32.4(From Mod 2):

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

Emission Unit: 1-CORON
 Process: CR1 Source Classification Code: 3-16-050-03
 Process Description:
 This process consists of one corona treatment unit that

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is connected to the MSC-1 coating machine. The corona treatment unit uses an electrical process that pretreats the film and generates ozone as a byproduct. The ozone is collected in a hood and vented to a stack on the Plant No. 2 roof.

Emission Source/Control: 00281 - Process

Emission Source/Control: 00282 - Process

Item 32.5(From Mod 2):

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

Emission Unit: 1-CORON

Process: CR2

Source Classification Code: 3-16-050-03

Process Description:

Process consists of one corona treatment unit that is connected to the 89-3 coating machine. The unit is an electrical process that pretreats the film and generates ozone. The ozone is collected in a hood and vented to a stack on the Plant No. 1 roof.

Emission Source/Control: 00291 - Process

Emission Source/Control: 00292 - Process

Item 32.6(From Mod 2):

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

Emission Unit: X-OXDZR

Process: OXA

Source Classification Code: 3-90-006-89

Process Description:

This process involves the venting of all air emissions from the coating and slitting machines in Plant 1 to Oxidizer #4 or Oxidizer #2, which serves as the backup unit.

Emission Source/Control: 0002A - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 0004A - Control

Control Type: HEATED CERAMIC MEDIA

Emission Source/Control: 00001 - Process

Emission Source/Control: 00002 - Process

Emission Source/Control: 00003 - Process

Emission Source/Control: 00004 - Process

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Emission Source/Control: 00005 - Process

Emission Source/Control: 00006 - Process

Emission Source/Control: 00007 - Process

Emission Source/Control: 00009 - Process

Emission Source/Control: 00010 - Process

Emission Source/Control: 00011 - Process

Emission Source/Control: 00012 - Process

Emission Source/Control: 00013 - Process

Emission Source/Control: 00015 - Process

Emission Source/Control: 00016 - Process

Emission Source/Control: 00017 - Process

Emission Source/Control: 00026 - Process

Item 32.7(From Mod 2):

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

Emission Unit: X-OXDZR

Process: OXB

Source Classification Code: 3-90-006-89

Process Description:

This process involves the venting of air emissions from the coating machines and parts washers in Plant 2 to Oxidizer #4 or Oxidizer #3, which serves as the backup unit.

Emission Source/Control: 0002A - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 0003A - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 0004A - Control

Control Type: HEATED CERAMIC MEDIA

Emission Source/Control: 00221 - Process

Emission Source/Control: 00222 - Process

Emission Source/Control: 00223 - Process

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Emission Source/Control: 00224 - Process

Emission Source/Control: 00271 - Process

Emission Source/Control: 00311 - Process
 Design Capacity: 21,500 cubic feet per minute (standard conditions)

Emission Source/Control: 00312 - Process
 Design Capacity: 21,500 cubic feet per minute (standard conditions)

Item 32.8(From Mod 2):

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

Emission Unit: X-OXDZR
 Process: OXC Source Classification Code: 3-90-006-89
 Process Description:
 This process involves the venting of all air emissions from coating machine MSC-4, identified as emission source 00271, to Oxidizer #4 or Oxidizer #3, which serves as the backup unit.

Emission Source/Control: 0003A - Control
 Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 0004A - Control
 Control Type: HEATED CERAMIC MEDIA

Emission Source/Control: 00271 - Process

Item 32.9(From Mod 2):

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

Emission Unit: X-OXDZR
 Process: TRS Source Classification Code: 3-90-006-89
 Process Description:
 This process consists of a Toluene Recovery System (TRS) which removes solvent from the emissions from the MSC coating machines through a carbon adsorption system and returns it to the process. Oxidizers 3 & 4 will serve as backups to the TRS system.

Emission Source/Control: 00321 - Control
 Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00221 - Process

Emission Source/Control: 00222 - Process

Emission Source/Control: 00224 - Process

Emission Source/Control: 00271 - Process

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Emission Source/Control: 00311 - Process
 Design Capacity: 21,500 cubic feet per minute (standard conditions)

Emission Source/Control: 00312 - Process
 Design Capacity: 21,500 cubic feet per minute (standard conditions)

Item 32.10(From Mod 0):

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

Emission Unit: 1-CORON
 Process: CR3 Source Classification Code: 3-16-050-03
 Process Description:

Process consists of two corona treatment units that are connected to the 89-2 and 89-3 coating machines. The corona treatment unit use an electrical process that pre-treats the film and generates ozone. The ozone is collected in hoods and vented to a stack on the Plant No. 1 roof.

Emission Source/Control: 00301 - Process

Emission Source/Control: 00302 - Process

Item 32.11(From Mod 0):

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

Emission Unit: 1-WEIGH
 Process: W01 Source Classification Code: 3-15-010-01
 Process Description:

A mixture of solid pigment resins and waxes are weighed at weigh stations and are then mixed and melted at the mix tanks. Dust from the weighing process is collected into dust collectors.

Emission Source/Control: 00018 - Control
 Control Type: FABRIC FILTER

Emission Source/Control: 00019 - Control
 Control Type: FABRIC FILTER

Emission Source/Control: 0018A - Process

Condition 33: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:6 NYCRR 227-1.3 (a)

Item 33.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-BOILR

Permit ID: 9-1422-00093/00035

Facility DEC ID: 9142200093

Item 33.2:

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 having an average opacity during any six consecutive minutes of 20 percent or greater from any emission source, except only the emission of uncombined water. 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 1-BOILR on a monthly basis. 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.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with 6NYCRR Part 227.1.3(a) 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 will 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: 20 percent

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.

The initial report is due 1/30/2017.

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

Condition 34: Compliance Certification

Effective between the dates of 10/25/2016 and 10/24/2021

Permit ID: 9-1422-00093/00035

Facility DEC ID: 9142200093

Applicable Federal Requirement:40CFR 60.48c(a), NSPS Subpart Dc

Item 34.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-BOILR

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner and operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7 of this part. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 35: Compliance Certification

Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:40CFR 60.48c(g), NSPS Subpart Dc

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-BOILR

Item 35.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall record and maintain records of the amount of fuels combusted during each calendar month in the source, provided that the facility only burns very low sulfur fuel oil or other liquid or gaseous fuels with a potential sulfur dioxide (SO₂) emissions rate of 0.32 lb/MMBtu (140 ng/J) heat input or less. The records for the amount of fuel burned monthly must be made available for review upon request.

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 36: Alternative Recordkeeping
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 40CFR 60.48c(g)(2), NSPS Subpart Dc

Item 36.1:

This Condition applies to Emission Unit: 1-BOILR

Item 36.2:

As an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

Condition 37: Reporting and Recordkeeping Requirements
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 40CFR 60.48c(g)(3), NSPS Subpart Dc

Item 37.1:

This Condition applies to Emission Unit: 1-BOILR

Item 37.2:

As an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of

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each steam generating unit fuel delivered to that property during each calendar month.

Condition 2-8: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 212-2.3 (a)

Replaces Condition(s) 38

Item 2-8.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-CORON

Item 2-8.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The corona treatment units at Plant 1 generate ozone and are subject to the control requirements of 6 NYCRR Part 212-2.3(a) Table 3. The hourly emission rate per unit is under 1 lb/hr; unit usage totaled only 40 hours in 2015.

IIMAK completed an air dispersion modeling analysis, and submitted a summary via email dated February 26, 2016, to determine if the maximum off-site ozone concentration from a corona treatment unit is less than the National Ambient Air Quality Standard, which is 0.070 ppm as an 8-hr standard. The analysis showed a maximum 1-hr impact at the property line of 0.017 ppm and an 8-hr maximum concentration of 0.010 ppm.

Operation of the corona treatment units is limited to the use of one unit at a time to limit the off-site ozone concentration as provided in the air dispersion modeling analysis. Usage records consisting of unit identification, date, time and duration of use must be maintained on-site and made available for review.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 39: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 212-1.6 (a)

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Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-WEIGH

Item 39.2:

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 having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions when the process is in operation. If any visible emissions are identified, corrective action is required. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 22)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 40: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement:6 NYCRR 212-2.4 (b)

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-WEIGH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 40.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The fabric filters will be operated in accordance with

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the manufacturer instructions. For each fabric filter collector equipped with a pressure gauge, the pressure drop across the device will be monitored and recorded once per shift when the emission source is operating. The pressure drop readings shall be recorded in a log with the date, time of observation and the name of the observer.

If the pressure drop is outside of the manufacturer's prescribed upper limit of 2.5 inches of water, the process and equipment must be inspected to identify the problem and to take corrective actions. The identified problem and corrective actions shall be recorded in the log. If the corrective actions do not bring the pressure drop within the correct range than the Department shall be notified within one business day.

Parameter Monitored: PRESSURE DROP
Upper Permit Limit: 2.5 inches of water
Reference Test Method: EPA Reference Method 5
Monitoring Frequency: PER SHIFT
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due every 6 calendar month(s).

Condition 42: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 228-1.3 (a)

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Item 42.2:

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 having an average opacity during any six consecutive minutes of 20 percent or greater from any emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

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The permittee will conduct observations of visible emissions from the emission unit X-OXDZR on a monthly basis. 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.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) 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 will 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: 20 percent
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.
The initial report is due 1/30/2017.
Subsequent reports are due every 6 calendar month(s).

Condition 43: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Item 43.1:
The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Item 43.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at

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least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 44: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 228-1.3 (c)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale,

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specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 45: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within any work area associated with a coating line, the owner or operator of a facility subject to this Subpart must:

(a) use closed, non-leaking containers to store or dispose

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of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

(g) clean hand held spray guns by one of the following:

- (1) an enclosed spray gun cleaning system that is kept closed when not in use;
- (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
- (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
- (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 46: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 228-1.4 (d)

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Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Class D pressure sensitive tape and labels coating processes, as defined in 6NYCRR Part 228, shall not operate unless:

1. Appropriate emission control requirements of 6NYCRR Part 228-1.5 have been met;
2. A process specific RACT variance has been granted in accordance with 6NYCRR Part 228-1.5(e); or
3. The facility only uses coatings with VOC contents, as applied, which do not exceed 0.067 Kg VOC/kg coating or Lb VOC/lb coating.

The VOC content limits can be met by averaging the VOC content of the materials used on a single surface coating line (i.e. daily with-in-line averaging). Materials used to form unsupported substrates, such as calendaring of vinyl, brown film, cast film, extruded film and co-extruded film are not considered coating for this purpose.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 2-9: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 228-1.5 (c)

Replaces Condition(s) 50

Item 2-9.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Item 2-9.2:

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK must assure compliance with the minimum overall VOC destruction/removal efficiency (DRE) rate of 90% for the capture and control devices. The overall VOC removal efficiency is the product of the capture efficiency of the gas collection system and the DRE of the control equipment.

IIMAK will meet the requirements of this condition by complying with the 95% reduction of organic HAP required by 40 CFR 63 JJJJ as outlined elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 48: Compliance Certification
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 228-1.5 (c)

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

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:

IIMAK will maintain a permanent total enclosure around each coater to provide 100% capture and maximize the overall removal efficiency of the control devices. The integrity of the enclosure will be ensured by periodic inspection, and by implementing a program to require the replacement, prior to resuming coater operation, of any portion of the enclosure removed during maintenance or other activities.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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The initial report is due 1/30/2017.
 Subsequent reports are due every 6 calendar month(s).

Condition 2-10: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement:40CFR 63.3320(b)(1), Subpart JJJJ

Item 2-10.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Regulated Contaminant(s):
 CAS No: 0NY100-00-0 TOTAL HAP

Item 2-10.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must limit organic HAP emissions to no more than 5% of the organic HAP applied for each month (95% reduction) on and after the compliance date specified in §63.3330. Compliance shall be demonstrated by following the provisions listed in §63.3370.

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 2-11: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement:40CFR 63.3350(f), Subpart JJJJ

Item 2-11.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Item 2-11.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK submitted the Enclosure Capture Monitoring Plan on May 15, 2019 as part of a modification application for

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their Title V operating permit.

Ongoing monitoring of PTE capture efficiency will be accomplished using two (2) main methods to verify 100% capture of emissions is maintained:

1) Enclosure Verification - During each shift the Supervisor conducts a check of each enclosure that is in use to ensure it is properly attached to coating station. This check is documented in a daily checklist and ensures that the enclosures are installed as designed.

2) Air Flow Direction Screening - A smoke generating device will be used to verify inward air flow at each web opening of each solvent coating station on a daily basis.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 2-12: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement:40CFR 63.3400(c)(2), Subpart JJJJ

Item 2-12.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Item 2-12.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK must submit a semiannual compliance report covering the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31, the report must contain the information in paragraphs (i) through (vi) below:

- (i) Company name and address.
- (ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report
- (iii) Date of report and beginning and ending dates of the reporting period.
- (iv) If there are no deviations from any emission

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limitations (emission limit or operating limit) that apply to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

(v) For each deviation from an emission limitation (emission limit or operating limit) that applies to the facility and that occurs at an affected source where the facility is not using a CMS to comply with the emission limitations in subpart JJJJ, the compliance report must contain the following information:

(A) The total operating time of each affected source during the reporting period.

(B) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(C) An estimate of the quantity of each regulated pollutant emitted over the emission limits in Sec. 63.3320 for each monthly period covered in the report if the source failed to meet an applicable emission limit of subpart JJJJ.

(vi) For each deviation from an emission limit occurring at an affected source where the facility is using a CEMS or CPMS to comply with the emission limit in subpart JJJJ, the facility must include the information in paragraphs (i) through (iii), above, and paragraphs (A) through (J) below:

(A) The total operating time of the web coating line(s) during the reporting period.

(B) The date and time that each CEMS and CPMS, if applicable, was inoperative except for zero (low-level) and high-level checks.

(C) The date and time that each CEMS and CPMS, if applicable, was out-of-control, including the information in Sec. 63.8(c)(8).

(D) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(E) A summary of the total duration (in hours) of each deviation during the reporting period and the total duration of each deviation as a percent of the total source operating time during that reporting period.

(F) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(G) A summary of the total duration (in hours) of CEMS

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and/or CPMS down time during the reporting period and the total duration of CEMS and/or CPMS down time as a percent of the total source operating time during that reporting period.

(H) A breakdown of the total duration of CEMS and/or CPMS down time during the reporting period into periods that are due to monitoring equipment malfunctions, non monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.

(I) The date of the latest CEMS and/or CPMS certification or audit.

(J) A description of any changes in CEMS, CPMS, or controls since the last reporting period.

(K) An estimate of the quantity of each regulated pollutant emitted over the emission limits in Sec. 63.3320 for each monthly period covered in the report if the source failed to meet an applicable emission limit of subpart JJJJ.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 2-13: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement:40CFR 63.3360(e), Subpart JJJJ

Item 2-13.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Process: OXB

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 2-13.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This condition applies to the regenerative thermal oxidizer (identified as Oxidizer #4/emission source 0004A) and two recuperative oxidizers (identified as Oxidizer #2/emission source 0002A and Oxidizer #3/emission source 0003A).

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IIMAK must assure compliance with the minimum overall organic HAP removal efficiency rate of 95% for the capture and control devices. The overall organic HAP removal efficiency must be verified via performance testing. The overall organic HAP removal efficiency is the product of the capture efficiency of the gas collection system and the destruction efficiency of the oxidizer(s). Process information necessary to determine the conditions in existence at the time of the performance test must be recorded. Operations during periods of startup, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.

The performance test determining the destruction efficiency of Oxidizers #2, 3, & 4 must be performed utilizing three 1-hr test runs, in accordance with 40CFR60, Appendix A, Method 18, 25, 25A, 204 or equivalent. [63.3360(e)(1)] The most recent performance test was completed on April 14, 2017. Testing must subsequently be performed once every five years, based on the date of the previous test. [63.3360(a)(2)(ii)] The relevant test methods measure Total Organic Compounds/VOCs. They do not give speciated results. Organic HAPs are expected to be reduced at the same rate as total VOCs.

The facility has documented 100% capture of emissions via permanent total enclosure (PTE) on each of the existing coaters. IIMAK must conduct a Method 204 test on the PTE equipped to emission source 00312, which will be constructed as of this permit modification, within 180 days of startup of the unit. [63.3360(f)]

The test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

USE OF PERFORMANCE TEST DATA:

Performance testing, in combination with the 100% capture provided by the documented permanent total enclosure, may determine that an oxidizer is providing an overall VOC and organic HAP removal efficiency rate greater than the minimum 95% requirement. IIMAK may use the higher overall VOC organic HAP removal efficiency rate in emission calculations.

Lower Permit Limit: 95 percent reduction by weight

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Reference Test Method: EPA Method 18, 25, 25A, 204 or equivalent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 2-14: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement:40CFR 63.3321(a), Subpart JJJJ

Item 2-14.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Process: OXB

Emission Source: 0002A

Item 2-14.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This condition applies to the recuperative oxidizer
(identified as Ox #2/emission source 0002A).

IIMAK will continuously monitor the combustion chamber temperature of Ox #2. The temperature will be maintained at or above 1613 degrees F, or above the temperature at which the most recent oxidizer performance test was conducted, to assure the minimum destruction efficiency based on source performance testing.

IIMAK must use a continuous monitor to measure the combustion chamber temperature and determine the rolling 3-hour average of all recorded readings for each operating period. The continuous monitor must be installed, periodically calibrated, and operated at all times Ox #2 is operating. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. IIMAK shall maintain continuous recording charts of the combustion chamber temperatures. The continuous chart recordings and the calibration data shall be maintained on-site for a period of 5 years and must have valid data from at least 90 percent of the hours during which the process is operated. These records shall be made available for review upon request by the Department. [63.3350(e)(1) through (8) and (e)(9)(i) and (ii)]

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Department. [63.3350(e)(1) through (8) and (e)(9)(i) and (ii)]

Parameter Monitored: TEMPERATURE
 Lower Permit Limit: 1535 degrees Fahrenheit
 Monitoring Frequency: CONTINUOUS
 Averaging Method: 3-HOUR ROLLING AVERAGE
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2021.
 Subsequent reports are due every 6 calendar month(s).

Condition 2-16: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement: 40CFR 63.3321(a), Subpart JJJJ

Item 2-16.1:
 The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR
 Process: OXB Emission Source: 0004A

Item 2-16.2:
 Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This condition applies to the regenerative thermal oxidizer (identified as Ox #4/emission source 0004A).

IIMAK will continuously monitor the combustion chamber temperature of Ox #4. The temperature will be maintained at or above 1621 degrees F, or above the temperature at which the most recent RTO performance test was conducted, to assure the minimum destruction efficiency based on source performance testing.

IIMAK must use a continuous monitor to measure the combustion chamber temperature and determine the rolling 3-hour average of all recorded readings for each operating period. The continuous monitor must be installed, periodically calibrated, and operated at all times Ox #4 is operating. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. IIMAK shall maintain continuous recording charts of the combustion chamber temperatures. The continuous chart recordings and the calibration data shall be maintained on-site for a period of 5 years and must have valid data from at least 90 percent of the hours

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during which the process is operated. These records shall be made available for review upon request by the Department. [63.3350(e)(1) through (8) and (e)(9)(i) and (ii)]

Parameter Monitored: TEMPERATURE
 Lower Permit Limit: 1621 degrees Fahrenheit
 Monitoring Frequency: CONTINUOUS
 Averaging Method: 3-HOUR ROLLING AVERAGE
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2021.
 Subsequent reports are due every 6 calendar month(s).

Condition 2-17: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement: 6 NYCRR 228-1.5 (c)

Replaces Condition(s) 47

Item 2-17.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR
 Process: TRS Emission Source: 00321

Item 2-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

This condition applies to the toluene recovery system (TRS) which is identified as emission source 00321.

Annual preventative maintenance will be performed on the TRS, including but not limited to, sampling and testing for apparent density, particle size distribution, and the carbon tetrachloride activity level of representative samples of carbon from the TRS.

Test results will be maintained on site for at least five years and made available to the Department upon request.

Monitoring Frequency: ANNUALLY
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2021.
 Subsequent reports are due every 6 calendar month(s).

Condition 2-18: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

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Applicable Federal Requirement: 6 NYCRR 228-1.5 (c)**Replaces Condition(s) 49****Item 2-18.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Process: TRS

Emission Source: 00321

Regulated Contaminant(s):

CAS No: 000108-88-3 TOLUENE

Item 2-18.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This condition applies to the toluene recovery system (TRS) which is identified as emission source 00321.

IIMAK must assure compliance with the minimum overall VOC removal efficiency rate of 90% for the capture and control devices. The overall VOC removal efficiency must be verified via performance testing. The overall VOC removal efficiency is the product of the capture efficiency of the gas collection system and the recovery efficiency of the TRS.

The overall VOC removal efficiency was verified via performance testing completed on April 14, 2017 and showed that the unit was in compliance with the standard. A performance test determining the removal efficiency of the TRS must be performed utilizing three 1-hr test runs, in accordance with 40CFR60, Appendix A, Method 18, 25, 25A, 204 or equivalent. Testing must subsequently be performed once every five years, based on the date of the previous test.

The test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

USE OF PERFORMANCE TEST DATA:

Performance testing, in combination with the 100% capture provided by the documented permanent total enclosure, may determine that the TRS is providing an overall VOC removal

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efficiency rate greater than the required minimum 90% and minimum 95% required by 40 CFR 63 JJJ. IIMAK may use the higher overall VOC removal efficiency rate in VOC emission calculations if the requirements are met.

Lower Permit Limit: 90 percent reduction by weight
 Reference Test Method: EPA RM 18, 25, 25A, 204 or equivalent
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2021.
 Subsequent reports are due every 6 calendar month(s).

Condition 2-19: Compliance Certification
Effective between the dates of 11/05/2020 and 10/24/2021

Applicable Federal Requirement: 40CFR 63.3350(d)(1), Subpart JJJ

Item 2-19.1:

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR
 Process: TRS Emission Source: 00321

Regulated Contaminant(s):
 CAS No: 000108-88-3 TOLUENE

Item 2-19.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This condition applies to the toluene recovery system (TRS) which is identified as emission source 00321. IIMAK must control TRS whenever emissions are routed to it from any of the coaters with a capture system and control equipment that provides for overall removal efficiency of at least 95%.

To calculate control device efficiency, the gas stream entering and exiting the control device must be continuously monitored to determine the total organic volatile matter mass flow rate. Volatile matter mass flow rate may be determined by measuring the concentration of the vent gas in grams per cubic meter and the volumetric flow rate in cubic meters per second such that the total organic volatile matter mass flow rate in grams per second can be calculated and that the control device efficiency of the control device can be calculated for each month.

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A MOCON 9000 Series hydrocarbon analyzer (or equivalent) will serve as a process control device (PCD) measuring the TRS outlet concentration and a lower explosive limit (“LEL”) analyzer is used measure the inlet concentration. The analyzer will be operated at all times that the associated TRS is operated. Calibration of the PCD, using certified calibration gasses of 0 ppm oxygen and 100 ppm methane (equivalent of 15.8 ppm toluene), will be completed on a daily basis. Calibration information, along with any variation from the setpoint before resetting, will be recorded in a log book.

Monitoring for breakthrough on each of the three operating beds of the TRS will take place by measuring the outlet toluene concentration. The TRS system will be set to change carbon beds when the stack analyzer ranges between 20 and 30 ppm. Under normal operating conditions the inlet range is between 1500 and 2500 ppm. Under upset conditions the high alarm is set for 35 ppm in the exhaust and the system automatic shutdown is set at 99 ppm in the exhaust. Carbon bed regeneration must be set to occur at an interval not to exceed 500 operating minutes, or when the outlet concentration reaches 10 ppm, whichever comes first.

Whenever the TRS is operating, inlet and outlet toluene concentration readings must be collected continuously and recorded electronically. The data acquisition system (DAS) collects the outlet VOC concentration at a rate of a minimum of four data points per hour, and records and retains 1-hr and must have valid data averages from at least 90 percent of the hours during which the process is operated. These records shall be made available for review upon request by the Department..

Calibration information and DAS data will be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Parameter Monitored: CONCENTRATION

Lower Permit Limit: 20 parts per million (by volume)

Upper Permit Limit: 30 parts per million (by volume)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

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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 by 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 be demonstrated 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 permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner 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 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 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: 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

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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 54: Contaminant List

Effective between the dates of 10/25/2016 and 10/24/2021

Applicable State Requirement: ECL 19-0301

Item 54.1:

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

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 55: Malfunctions and start-up/shutdown activities

Effective between the dates of 10/25/2016 and 10/24/2021

Applicable State Requirement: 6 NYCRR 201-1.4

Item 55.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the

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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 malfunctions, 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 department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, 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 stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and 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. 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, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the 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 29: Air pollution prohibited
Effective between the dates of 10/25/2016 and 10/24/2021

Applicable State Requirement:6 NYCRR 211.1

Item 29.1:

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.

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