



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-1422-00428/00001  
Effective Date: 07/27/2018 Expiration Date: 07/26/2028

Permit Issued To: PACKSTAR GROUP INC  
215 JOHN GLENN DR  
BUFFALO, NY 14228

Contact: ANDREW C SHARP  
PACKSTAR GROUP  
215 JOHN GLENN DR  
BUFFALO, NY 14228  
(716) 853-1688

Facility: PACKSTAR GROUP  
215 JOHN GLENN DR  
AMHERST, NY 14228

Contact: ANDREW C SHARP  
PACKSTAR GROUP  
215 JOHN GLENN DR  
BUFFALO, NY 14228  
(716) 853-1688

Description:  
Packstar located in Amherst, NY produces flexible shrink wrap packaging tubes. Processes involve printing, slitting, seaming the edges of sheet film stock into a tube (using a solvent to weld the edges) and cutting tubes to length. Printing is done with rotogravure printing presses and ultra-violet (UV) printing presses. The finished product is provided to the customer as either a cut to order cylindrical tube or a roll of cylindrical stock. The tube can then be placed over the product and heat applied to shrink the cylinder around the packaged product.

This permit renewal reflects a regulatory change which has since required Air State Facility (ASF) permits to be given expiration dates of up to ten years from issuance. The previously issued ASF permit has been “called in” for updating as it was issued without an expiration date, and applicable requirements have changed.

The applicable requirements that need to be added to the facility permit are:



6NYCRR Subpart 228-2 Commercial and Industrial Adhesives, Sealants, & Primers

6NYCRR Part 234 Graphic Arts Processes

This renewal also approves the installation of a new 14-color packaging rotogravure press, Hsing Wei Model 1000 X 14. The facility currently operates an 8-color rotogravure press, Hsing Wei Model HWA-1000, and a 12-color rotogravure press, Hsing Wei Model HWA-1200. The presses have ducted drying hoods at each of the color stations currently connect to a fluidized carbon adsorption bed and thermal oxidizer to control emission of Volatile Organic Compounds (VOC) into the atmosphere which will be replaced by a new Regenerative Thermal Oxidizer (RTO).

Packstar is required to perform an initial performance test to determine the overall VOC removal efficiency of the RTO. This initial performance test must occur no later than 180 days after the installation date of the RTO which will include testing for destruction efficiency and permanent total enclosure (PTE). The performance test determining the destruction efficiency of the oxidizer must be performed, in accordance with 40CFR60, Appendix A, Method 18, 25 or 25A. This test shall be repeated at least once every five years, based on the date of the previous test. The capture efficiency will be determined by testing the PTE system of the press room in accordance with 40CFR60, Appendix A, Method 204. The PTE testing need only be repeated if physical changes to the press room occur.

Solvents used in the seaming operation at the facility are regulated pursuant to 6 NYCRR Part 228-2.3(b)(22) and fall under the “Other Plastic Cement Welding” category with a regulatory VOC content limit of 510 grams per liter. The Department conducted an industry-wide data analysis project and concluded that it is not currently economically feasible to apply controls nor is there a compliant solvent for this use. Therefore, VOC emissions from the seaming operation will be limited to less than 3 tons per year and will be considered Reasonable Available Control Technology (RACT) in lieu of a process-specific RACT demonstration submission per 6 NYCRR Part 228-2.4(e). It is currently not possible for Packstar to comply with the 510 grams per liter VOC content limit. As such, the total VOC emissions from all seaming operations at the facility must remain less than three tons per year (3 tpy) on a rolling twelve-month basis.



Potential VOC emissions in excess of 1100 tons per year will continue to be limited below the major source threshold of 50 tons through federally enforceable permit conditions describing the operation of the RTO. When operated and maintained properly, the control equipment will allow Packstar to maintain VOC emissions below the facility emission limit of 49.9 tons to avoid the requirements of 6NYCRR 201-6, Title V Facility Permits.

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: \_\_\_\_ / \_\_\_\_ / \_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

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



**DEC GENERAL CONDITIONS**  
**\*\*\*\* General Provisions \*\*\*\***  
**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**  
**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

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

**Condition 3: Applications for permit renewals, modifications and transfers**  
**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3**

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



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

**Item 4.1:**

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

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

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2915  
(716) 851-7165

**New York State Department of Environmental Conservation**

Permit ID: 9-1422-00428/00001

Facility DEC ID: 9142200428



**Permit Under the Environmental Conservation Law (ECL)**

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY  
PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: PACKSTAR GROUP INC  
215 JOHN GLENN DR  
BUFFALO, NY 14228

Facility: PACKSTAR GROUP  
215 JOHN GLENN DR  
AMHERST, NY 14228

Authorized Activity By Standard Industrial Classification Code:  
2671 - PAPER COATED AND LAMINATED PACKAGING  
2754 - COMMERCIAL PRINTING, GRAVURE

Permit Effective Date: 07/27/2018

Permit Expiration Date: 07/26/2028





**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6 NYCRR 201-6.4 (e): Compliance Demonstration
- 2 6 NYCRR 202-1.1: Required Emissions Tests
- 3 6 NYCRR 201-7.1: Facility Permissible Emissions
- \*4 6 NYCRR 201-7.1: Capping Monitoring Condition
- 5 6 NYCRR 211.1: Compliance Demonstration
- 6 6 NYCRR 234.4 (b): Compliance Demonstration
- 7 6 NYCRR 234.4 (b): Compliance Demonstration
- 8 6 NYCRR 234.4 (c): Compliance Demonstration
- 9 6 NYCRR 234.5: Compliance Demonstration
- 10 6 NYCRR 234.6: Compliance Demonstration
- 11 6 NYCRR 234.7: Compliance Demonstration

**Emission Unit Level**

- 12 6 NYCRR 201-7.1: Emission Unit Permissible Emissions

**EU=0-0EU01,Proc=P02**

- 13 6 NYCRR Subpart 228-2: Compliance Demonstration

**EU=0-0EU01,EP=EP005,Proc=P01**

- 14 6 NYCRR 234.8: Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 15 ECL 19-0301: Contaminant List
- 16 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 17 6 NYCRR Subpart 201-5: Emission Unit Definition
- 18 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 19 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 20 6 NYCRR 211.1: Air pollution prohibited
- 21 6 NYCRR 211.2: Visible Emissions Limited

**Emission Unit Level**

- 22 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 23 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



**FEDERALLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

**Item A: Sealing - 6 NYCRR 200.5**

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

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

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

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

**Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6**

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

**Item C: Maintenance of Equipment - 6 NYCRR 200.7**

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



required to operate such device effectively.

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

**Item E: Recycling and Salvage - 6 NYCRR 201-1.7**

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

**Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8**

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

**Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)**

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

**Item H: Proof of Eligibility for Sources Defined as Trivial**



**Activities - 6 NYCRR 201-3.3 (a)**

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

**Item I: Required Emission Tests - 6 NYCRR 202-1.1**

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

**Item J: Open Fires Prohibitions - 6 NYCRR 215.2**

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

**Item K: Permit Exclusion - ECL 19-0305**

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

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



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

**FEDERAL APPLICABLE REQUIREMENTS**

**The following conditions are federally enforceable.**

**Condition 1: Compliance Demonstration**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

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

**Item 1.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 1.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;and
  - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in

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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  
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 1/30/2019.

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Subsequent reports are due on the same day each year

**Condition 2: Required Emissions Tests**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 2.1:**

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 3: Facility Permissible Emissions**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

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

**Item 3.1:**

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

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

PTE: 99,800 pounds per year

**Condition 4: Capping Monitoring Condition**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

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

**Item 4.1:**

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 201-6

**Item 4.2:**

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

**Item 4.3:**

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.

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**Item 4.4:**

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 4.5:**

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 4.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Total actual emissions of volatile organic compounds (VOC) from all emission sources including exempt, trivial, and fugitive, shall not exceed 50 tons during any consecutive twelve-month period. By accepting this federally enforceable emissions limit, the facility will not be subject to the major source Title V permitting requirements

Potential VOC emissions in excess of 1100 tons per year will be limited through the use of a Regenerative Thermal Oxidizer (RTO). This control equipment shall be operated at the established parameters described within this permit.

Each calendar month, the facility-wide 12-month rolling total for VOC emissions shall be determined by adding the current monthly VOC emissions to the VOC emissions for the previous 11 months. It shall be assumed that 100% of the VOCs contained in these products are emitted to the ambient air, VOC emissions from the rotogravure printing presses (Emission Sources 0ES01, 0ES02, and 0ES07) are to be calculated using a capture efficiency of 100% through Permanent Total Enclosure (PTE) of the printing room. The PTE capture efficiency will be demonstrated by Method 204 and a destruction efficiency based on the results of the





most recent performance test of the RTO. All doors into the press room are to be kept closed during production, except doors shall be open only the minimum time required to complete a task and shall be closed immediately upon completion or during periods of inactivity while conducting the task. Activities that necessitate opening doors include maintenance and other activities required for business.

Product data sheets, formulation data or the equivalent are to be used to determine the VOC content of all materials used at the facility. The facility shall keep and maintain accurate records for VOC emitting activities to determine total VOC emissions based on verifiable data.

These records shall include:

- a current list of all VOC containing products used for activities throughout the facility with current information on the manufacturer and product name/code, VOC content, and other pertinent data;
- a monthly log of the consumption of any product containing VOCs used throughout the facility;
- any other information that supports the monthly log, such as purchase orders, invoices, equipment operation, maintenance and repair logs/records, production records, metering logs, and continuous temperature recordings for RTP.
- all calculations used to determine the monthly emissions; and
- information, such as make, model, maximum design process rate or throughput, etc. on equipment, including control equipment, used in any prepress, press and postpress operation which emit VOCs.

The total VOCs contained in waste sent offsite may be subtracted from the total facility VOC emissions calculated from purchase/usage records, as described above only if the VOC content of the waste has been determined by an unaffiliated lab or waste disposal facility and can be verified by RCRA waste disposal records for this facility. Copies of the RCRA reports, analyses and any other supporting documentation that are used to determine facility totals shall be kept on-site.

When an MSDS or Product Data Sheet shows a range for chemical content, the maximum content shall be used to determine emissions.

The owner or operator of any facility which uses air pollution control equipment to comply with an emissions cap, standard, limit or any other requirement must operate and maintain such equipment in a manner consistent with good engineering practices.



Annual Emission Cap reports must be submitted to the Regional Air Pollution Control Engineer by January 31 for the previous calendar year summarizing total VOC emissions for each consecutive 12-month period of the reporting year. All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported.

Noncompliance with the rolling twelve-month total must be reported immediately on discovery.

All records are to be maintained on-site for a minimum of five years and kept in a format easily accessible and made available to Department representatives on request.

Parameter Monitored: VOC

Upper Permit Limit: 49.9 tons

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

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

**Condition 5: Compliance Demonstration**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 5.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 5.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Doors shall be open only the minimum time required to complete a task and shall be closed immediately upon completion or during periods of inactivity while conducting the task. Activities that necessitate opening doors include maintenance and other activities required for business. Each location of a rotogravure press will meet the criteria of Method 204 for permanent total enclosure.

The facility shall make additional changes to their

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operations to reduce emissions and/or mitigate odors, if necessary. Any complaints received regarding odors caused by the facility or associated operations shall be recorded in a permanently bound logbook and reported to the NYSDEC within 2 business days of occurrence. The cause of the problem shall be investigated and corrective action taken immediately. Details shall be provided to the NYSDEC in a written report within 30 days of the complaint.

All records shall be maintained onsite for 5 years and shall be readily available upon request by the NYSDEC and/or USEPA.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

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

**Condition 6: Compliance Demonstration**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

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

**Item 6.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 6.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

VOC capture efficiency will be determined by testing the PTE system of the press room in accordance with 40CFR60, Appendix A, Method 204. The PTE testing need only be repeated if physical changes to the press room occur. The capture efficiency testing of the emission sources need only be repeated if physical changes to the air distribution system occur. Physical changes to the air distribution system include, but are not limited to, adding print stations to a press, increasing or decreasing the volumetric flow rate from the dryer (e.g., by changing the size of press fans/motors or removal or derating of dryers), and changing the static duct pressure.

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



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DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

**Applicable Federal Requirement:6 NYCRR 234.4 (c)**

**Item 8.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The RTO temperature is to be maintained at all times when the presses are in operation. The manufacturer's recommended temperature will be used until the initial performance test is completed, afterwards the RTO temperature will be maintained at or above the temperature used during the performance test.

To verify compliance with the minimum temperature requirement, the combustion chamber temperature must be continuously monitored and recorded. The continuous temperature recorder shall be installed, operated, calibrated and maintained in accordance with this permit and the manufacturer's recommendations. Original recorder charts and/or electronic data showing continuous monitoring and recording of the combustion chamber operating temperature and records of calibration, maintenance and repair shall be kept onsite.

All electronic data shall be stored securely and backed up on a daily basis. The facility shall include a certified statement in the annual compliance report indicating that all requirements as specified in this condition have been fulfilled during the calendar year. Any deviations shall be reported to the Department. Records are to be maintained on-site for a minimum of five years and kept in a format easily accessible and made available to Department representatives on request.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS



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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

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

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

**Applicable Federal Requirement:6 NYCRR 234.5**

**Item 9.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which a coating, ink or adhesive is to be applied to a substrate.

This prohibition shall not apply to the following:

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

**Applicable Federal Requirement:6 NYCRR 234.6**

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**Item 10.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following handling, storage and disposal requirements for VOC containing compounds shall be observed:

(1) all containers used to store or dispose of cloth or paper impregnated with solvents used for surface preparation, cleanup or ink/coating removal shall be covered with a tight-fitting lid and kept closed, except momentarily, when adding or removing materials and/or soiled towels;

(2) spent or fresh solvents to be used for surface preparation, cleanup, ink/coating removal or recycling shall be stored in closed containers with tight fitting lids;

(3) open containers shall not be used to store or dispense inks, coatings, solvents, etc. unless production, sampling, maintenance or inspection procedures require operational access. This does not apply to the actual device or equipment designed for the purpose of applying an ink or a coating to a substrate; and

(4) inks, coatings and/or any other VOC containing products or waste shall be stored or disposed of in containers that are kept closed with tight fitting lids.

All employees involved with these activities shall be properly trained in good housekeeping and work practices that result in the minimization of air pollution and shall be familiar with the requirements of this permit. The facility shall include a certified statement in the annual compliance report indicating that all requirements as specified in this condition have been fulfilled during the calendar year. Any deviations shall be reported. All records of waste disposal shall be kept onsite and made available to Department representatives on request.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

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

**Condition 11: Compliance Demonstration**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

**Applicable Federal Requirement:6 NYCRR 234.7**

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**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Packstar is required to properly maintain and operate the RTO to ensure the destruction efficiency of the unit is maintained. This shall be accomplished by completing the regularly scheduled maintenance activities as specified in the manufacturer's maintenance manual. The maintenance activities shall be documented and shall be kept on-site for a minimum of five years and be made available for review upon request by the Department

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 12: Emission Unit Permissible Emissions**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

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

**Item 12.1:**

The sum of emissions from all regulated processes specified in this permit for the emission unit cited

shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 0-0EU01

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 99,800 pounds per year

**Condition 13: Compliance Demonstration**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

**Applicable Federal Requirement:6 NYCRR Subpart 228-2**

**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0EU01

Process: P02



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

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The solvents used in this operation are regulated pursuant to 6 NYCRR Part 228-2.3(b)(22) and fall under the “Other Plastic Cement Welding” category with a regulatory VOC content limit of 510 grams per liter. The Department conducted an industry-wide data analysis project and concluded that it is not currently economically feasible to apply controls nor is there a compliant solvent for this use. Therefore, limiting VOC emissions from seaming operation to less than 3 tons per year will be considered Reasonable Available Control Technology (RACT) in lieu of a process-specific RACT demonstration submission per 6 NYCRR Part 228-2.4(e).

It is currently not possible for Packstar to comply with the 510 grams per liter VOC content limit. As such, the total VOC emissions from all seaming operations at the facility must remain less than three tons per year (3 tpy) on a rolling twelve-month basis. Emissions shall be calculated using a combination of material usage and production records of material processed by the equipment. Records of the data used to demonstrate compliance with this condition shall be retained on site for five years and made available to the Department upon request.

The facility will re-evaluate every five years applicability with 6 NYCRR Part 228-2 or sooner prior to any facility process/material changes or Department revisions to Part 228-2. Any findings indicating that the 3 tpy VOC emission limit mentioned above is no longer warranted will require a permit modification. The first re-evaluation will be due to the Department no later than five years from the date of permit issuance.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: VOC's

Upper Permit Limit: 3 tons

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

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

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**Condition 14: Compliance Demonstration**  
Effective between the dates of 07/27/2018 and 07/26/2028

**Applicable Federal Requirement: 6 NYCRR 234.8**

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0EU01                      Emission Point: EP005  
Process: P01

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A person shall not cause or allow emissions having an average opacity of 10 percent or greater for any consecutive six minute period from any emission source subject to this Part into the outdoor atmosphere.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**STATE ONLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

An emergency, as defined 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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 15: Contaminant List**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

**Applicable State Requirement:ECL 19-0301**

**Item 15.1:**  
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY998-00-0

Name: VOC

**Condition 16: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 07/27/2018 and 07/26/2028**

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

**Item 16.1:**



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each of the color stations which will direct volatile organic compound (VOC) emissions to a new regenerative thermal oxidizer (RTO) (Emission Control 0ES08). Exhaust from the RTO will be directed to new Emission Point EP005.

Process P02 comprises seam sealing operations, which involves sealing two or more layers of plastic material using solvent. The process includes several stations (Emission Source 0ES03) where packaging film is cut and sealed using a solvent to weld the edges of the sheet of film stock into a tube. VOC emissions are released as fugitives to room air.

Building(s): 001

**Condition 18: Renewal deadlines for state facility permits  
Effective between the dates of 07/27/2018 and 07/26/2028**

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

**Item 18.1:**

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Condition 19: Compliance Demonstration  
Effective between the dates of 07/27/2018 and 07/26/2028**

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

**Item 19.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 19.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 9  
270 Michigan Ave.  
Buffalo, NY 14203

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 20: Air pollution prohibited**



Effective between the dates of 07/27/2018 and 07/26/2028

Applicable State Requirement:6 NYCRR 211.1

**Item 20.1:**

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.

**Condition 21: Visible Emissions Limited**

Effective between the dates of 07/27/2018 and 07/26/2028

Applicable State Requirement:6 NYCRR 211.2

**Item 21.1:**

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.

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

**Condition 22: Emission Point Definition By Emission Unit**

Effective between the dates of 07/27/2018 and 07/26/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

**Item 22.1:**

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

Emission Unit: 0-0EU01

Emission Point: EP005

Height (ft.): 35

Diameter (in.): 64

NYTMN (km.): 4770.953 NYTME (km.): 189.737 Building: 001

**Condition 23: Process Definition By Emission Unit**

Effective between the dates of 07/27/2018 and 07/26/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

**Item 23.1:**

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

Emission Unit: 0-0EU01



Process: P01 Source Classification Code: 4-05-005-12

Process Description:

Rotogravure printing. All presses have ducted drying hoods at each of the color stations which will direct volatile organic compound (VOC) emissions to a new regenerative thermal oxidizer (RTO) (Emission Control 0ES08). Exhaust from the RTO will be directed to Emission Point EP005.

Emission Source/Control: 0ES08 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: 0ES01 - Process

Emission Source/Control: 0ES02 - Process

Emission Source/Control: 0ES07 - Process

**Item 23.2:**

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

Emission Unit: 0-0EU01

Process: P02 Source Classification Code: 3-08-010-03

Process Description:

This process identifies several stations where packaging film is cut and sealed using Tetrahydrofuran as a solvent to weld the edges of the sheet of film stock into a tube. Volatile organic compounds are released as fugitives.

Emission Source/Control: 0ES03 - Process



