

**Division of Air Resources
Permit Review Report**

Permit ID: 8-5430-00017/00092

Renewal Number: 2

03/31/2025

Facility Identification Data

Name: ABX INNOVATIVE PACKAGING SOLUTIONS LLC

Address: 200 E MAIN ST

MACEDON, NY 14502

Owner/Firm

Name: ABX INNOVATIVE PACKAGING SOLUTIONS LLC

Address: 200 E MAIN ST

MACEDON, NY 14502, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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6274 E AVON LIMA RD

AVON, NY 14414

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Division of Air Resources:

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Name: STEVEN GLAB

Address: 2015 AYRSLEY TOWN BLVD., SUITE 202

CHARLOTTE, NC 28273

Phone:

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

This project is an application for Renewal 2 of the Air Title V permit. This Renewal incorporates changes proposed in multiple minor permit modifications and Operational Flexibility (Op-Flex) notifications submitted during the term of the prior permit. Changes to permit structure, emissions process, and permit conditions have been made to reflect current operations.

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The following equipment and processes have been added since the prior permit. Please note that a number of sources added via minor modification or Operational Flexibility during the term of the prior permit were removed prior to this Renewal and are not included in the list below.

- Press Line 272 (Emission Source 00255), Press 272 surface treatment unit for (ES 25501), an associated ozone treatment unit (Control MF255), and Emission Point (EP MF255) – December 21, 2012 Op-Flex
- Press Line 271 (Emission Source 00271), regenerative thermal oxidizer No. 3 (Control OX003), and EP EP0X3 – November 17, 2014 Minor Permit Modification
- Extrusion line 151-153 surface treatment units (ES 00151-00153), associated ozone treatment units (Controls MF151-153) and EPs MF151-153) – March 13, 2017 Minor Permit Modification
- Polymer use bin No. 17 (ES PUB17) and associated fabric filter control (Control EBP17), surface treatment units for extrusion line 155 (ES 0155A, 0155B) and associated ozone treatment unit (Control MF155) – June 20, 2023 Minor Permit Modification
- Additionally, some existing equipment and processes that were erroneously excluded from prior permits have been added as part of this Renewal.
 - Boiler No.5 (EU C-OMBUS, Process 001, Source BOIL5)
 - Miscellaneous printing support operations (EU Z-MISCL, Processes 097, 098, 099, and associated emission sources, controls and emission points).

The following equipment and processes have been removed since the prior permit:

- Flexographic printing presses 201-208 (Emission Sources (ES) 00525, 00526, 00527, 00522, 00523), 563 (ES PP002), and 601-606 (ES 0552A, 0552B, 0553A, 0553B, 0555A, 0555B).
- The surface treatment unit for Press 273 (ES 27301) and the associated ozone treatment unit (Control MF273).
- The surface treatment unit for extrusion line 153 (ES 00153) and the associated ozone treatment unit (Control MF153).
- Ink pail washing operations (Emission Unit I-NKMIX, Process 006, ES MF006)
- Catalytic afterburners for the presses (Controls MF035, MF036, and MF563)
- Plate production process (Emission Unit P-LATES) and associated processes, sources, controls, and emission points.
- Gravure coating and E-beam lamination operations (Emission Unit A-DHEAS) and associated processes, sources, controls, and emission points.

Relocation or removal of permit conditions have been made where necessary as part of this renewal to reflect the above changes. Revisions to permit conditions have been made to reflect updated regulations or to improve clarity.

Attainment Status

ABX INNOVATIVE PACKAGING SOLUTIONS LLC is located in the town of MACEDON in the county of WAYNE.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status

Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT

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Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

The ABX Innovative Packaging Solutions, LLC Macedon NY facility manufactures plastic bags and film. The associated manufacturing processes include extrusion and printing of plastic bags and film.

Permit Structure and Description of Operations

The Title V permit for ABX INNOVATIVE PACKAGING SOLUTIONS LLC is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

ABX INNOVATIVE PACKAGING SOLUTIONS LLC is defined by the following emission unit(s):

Emission unit HPRINT - Flexographinc printing presses all exhausting through individual hot air dryers, all of the dryers exhaust through one of four oxidizers.

As of 5/1/2020, Pliant has authority to operate Six(6) ten color, four (4) four color, and one (1) one color flexographinc printing presses. Capture and control requirements are dependent upon date of install of printing press, control equipment and any applicable RACT variance.

OX001 is used to control VOC emissions from one ten color press, line/source PP001.

OX002 is used to control VOC emissions from four (4) ten-color presses line/source, PP004, 00272, 00271, and 00257

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OX003 is used to control VOC emissions from five (5) four color presses and one (1) one color press: lines 272, 601, 603, 604, 605, and 606.

Printing occurs in buildings 18, 19, 26, and 30.

Emission unit HPRINT is associated with the following emission points (EP):

EP001, EP0X3, EPP02

Process: 002 is located at 1, Building 18 - Flexographic printing operations. Fluid inks are applied to plastic film substrate and dried using hot air dryers. Printing occurs in buildings 18, 19, 26, and 30.

Process: 02A is located at 1, Building 18 - Flexographic printing operations on Press Line 251 (ES PP001) which is subject to emissions capping under 6 NYCRR 201-7.1. Fluid inks are applied to plastic film substrate and dried using hot air dryers. VOC emissions are controlled using RTO#1 (Control OX001).

Printing occurs in buildings 18, 19, 26, and 30.

Emission unit HTREAT - Electrostatic discharge film treaters. The treaters make the polyethylene substrate printable.

Film treating occurs in buildings 14, 20A, and 30.

Emission unit HTREAT is associated with the following emission points (EP):

EP005, M511D, M518A, MF151, MF152, MF153, MF155, MF255, MF401, MF515

Process: 003 is located at 1, Building 14 - Electrostatic surface treatment of polyethylene film, which increases the surface tension energy to make it printable. The polyethylene film is transported into a treatment station where it is supported on a dielectric covered roll and a corona is impinged onto the surface of the film. An electronic power converter creates high frequency (9,600 Hertz) high voltage (10,000V) from industrial power to create the corona discharge. A by-product of the corona discharge is ozone. Ozone emissions are controlled via ozone depletion units (which perform catalytic reduction).

Process occurs in buildings 14, 20A, and 30.

Emission unit SOLVNT - Bulk solvent storage operations.

Located outside, tank storage area.

Process: 700 is located at Building OUTSIDE - Storage of propanol or reclaimed solvent in four (4) underground storage tanks.

Process occurs outside, tank storage area.

Emission unit ZMISCL -

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Emission unit ZMISCL is associated with the following emission points (EP): EPB02, EPB03, EPB04, EPB05, EPB06, EPB07, EPB09, EPB10, EPB11, EPB12, EPB13, EPB14, EPB15, EPB16, EPB17, EPB99, EPBFR, EPINK, EPRCU
 Process: 097 is located at Building 14 - Miscellaneous general process emission sources with emissions of VOCs only.

Process occurs in buildings 14, 15, and 20A.

Process: 098 is located at Building 14 - Miscellaneous general process emission sources with emissions of VOCs and particulates.

Process occurs in buildings 14, 15, and 20A.

Process: 099 is located at Building 14 - Miscellaneous general process emission sources with emissions of particulates only.

Process occurs in buildings 14, 15, and 20A.

Emission unit COMBUS - Natural gas combustion. One Cleaver Brooks 10.5 MMBtu/hr boiler installed in 1958.

Emission unit COMBUS is associated with the following emission points (EP): EPBL5

Process: 100 is located at Building 14 - Boilers firing natural gas.

Title V/Major Source Status

ABX INNOVATIVE PACKAGING SOLUTIONS LLC is subject to Title V requirements. This determination is based on the following information:
 The facility is a major source of air emissions due to potential-to-emit (PTE) emissions of volatile organic compounds (VOCs) greater than 50 tons per year. Therefore, the facility is required to obtain an Air Title V permit.

Program Applicability

The following chart summarizes the applicability of ABX INNOVATIVE PACKAGING SOLUTIONS LLC with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES

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NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52.21, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NO_x for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which

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specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

2673 3081	BAGS: PLASTICS, LAMINATED AND COATED UNSUPPORTED PLASTICS FILM AND SHEET
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SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code

Description

1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
3-12-999-99	MACHINERY, MISCELLANEOUS ELECTRICAL EQUIPMENT - MISCELLANEOUS MACHINERY
3-30-001-02	Other Not Classified TEXTILE PRODUCTS TEXTILE PRODUCTS - MISCELLANEOUS
4-05-003-01	Printing PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL
4-05-006-01	PRINTING - FLEXOGRAPHIC PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL
4-90-002-01	Ink Mixing: General ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION WASTE SOLVENT RECOVERY OPERATIONS Storage Tank Vent

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In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000092-52-4	1, 1 BIPHENYL			0.09	
000079-34-5	1,1,2,2-TETRACHLOROETHANE			0.028	
000107-06-2	1,2-DICHLOROETHANE			0.018	
000107-21-1	1,2-ETHANEDIOL			0.39	
000106-99-0	1,3-BUTADIENE			0.4	
000542-75-6	1-PROPENE, 1,3-DICHLORO-2-PROPENOIC ACID			0.018	
000079-10-7	ACETALDEHYDE			2.8	
000075-07-0	ACROLEIN			400	
000107-02-8	BENZENE			10.4	
000071-43-2	BENZENE, (1-METHYLETHYL)			0.2	
000098-82-8	CARBON DIOXIDE EQUIVALENTS	88000000		0.34	
0NY750-00-0	CARBON MONOXIDE	64000			
000630-08-0	CARBON TETRACHLORIDE			0.026	
000056-23-5	CHLOROBENZENE			0.019	
000108-90-7	CHLOROFORM			0.02	
000067-66-3	DICHLOROMETHANE			0.06	
000075-09-2	ETHANE, 1,1,2-TRICHLORO			0.022	
000079-00-5	ETHANE, 1,1-DICHLORO-			0.016	
000075-34-3	ETHANE, 1,2-DIBROMO			0.03	
000106-93-4	ETHANE, CHLORO			0.0008	

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000100-41-4	ETHYLBENZENE		0.34
000050-00-0	FORMALDEHYDE		7
000110-54-3	HEXANE		170
007439-92-1	LEAD	0.168	
000067-56-1	METHYL ALCOHOL		1.3
000091-20-3	NAPHTHALENE		0.06
0NY210-00-0	OXIDES OF NITROGEN	82000	
0NY075-00-0	PARTICULATES	70000	
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-		0.36
000108-95-2	PHENOL		0.018
0NY075-00-5	PM-10	70000	
0NY075-02-5	PM-2.5	68000	
0NY505-00-0	POLYCYCLIC ORGANIC MATTER (POM)	0.26	0.0081
000078-87-5	PROPANE, 1,2-DICHLORO		0.019
000123-38-6	PROPIONALDEHYDE		300
000100-42-5	STYRENE		0.024
007446-09-5	SULFUR DIOXIDE	840	
000108-88-3	TOLUENE		0.32
0NY100-00-0	TOTAL HAP	1620	
000075-01-4	VINYL CHLORIDE		0.01
0NY998-00-0	VOC	79800	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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 Part 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 Part 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.

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- Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 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 Part 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 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 Part 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 Part 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 facility for any violation of applicable requirements prior to or at the time of permit issuance;

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- 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 Part 201-6.4(i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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_02

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 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.

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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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	52	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63-KK.829 (d)	34	Printing and Publishing NESHAP-Recordkeeping
FACILITY	40CFR 63-ZZZZ	35	Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	17	Chemical accident prevention provisions
FACILITY	40CFR 82-F	18	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	Maintenance of equipment.
FACILITY	6NYCRR 201-1.15	54	Requirement to Commence Construction
FACILITY	6NYCRR 201-1.4	53	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	19, 36, 37	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	14	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (a) (8)	15	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Records of

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FACILITY	6NYCRR 201-6.4 (c) (3) (ii)	5	Monitoring, Sampling and Measurement Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (d) (4)	20	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f)	21	Operational Flexibility
FACILITY	6NYCRR 201-7.1	38	Emission Capping in Facility Permits
FACILITY	6NYCRR 202-1.1	16	Required emissions tests.
FACILITY	6NYCRR 202-2.4 (a) (3)	22	Emission statement methods and procedures
FACILITY	6NYCRR 202-2.5	7	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	55	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	23	General Prohibitions - visible emissions limited.
Z-MISCL/EPB02	6NYCRR 212-1.6 (a)	51	Limiting of Opacity
Z-MISCL	6NYCRR 212-2.4 (b)	50	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	8	Open Fires - Prohibitions
C-OMBUS	6NYCRR 227-1.3 (c)	39	Annual Tune-up Requirement
FACILITY	6NYCRR 227-1.4 (a)	24	Opacity Standard
FACILITY	6NYCRR 229.3 (e) (2) (v)	25	Volatile organic liquid storage tanks
S-OLVNT	6NYCRR 229.5 (d)	49	Recordkeeping - VOL storage tanks
FACILITY	6NYCRR 231-11.2 (b)	26	Reasonable Possibility requirements for insignificant mods - less than 50% with excluded emissions
FACILITY	6NYCRR 231-11.2 (c)	27	Reasonable Possibility requirements for insignificant mods - greater than 50% with excluded emissions
H-PRINT	6NYCRR 234.1 (c)	40	Once in , always in
FACILITY	6NYCRR 234.3 (a) (1) (ii) (28	Control requirements - capture and control (installed prior to 7/8/2010)
FACILITY	6NYCRR 234.3 (a) (1) (ii) (29	Control requirements - process installed after 3/14/1995, control installed after 7/8/2010
H-PRINT	6NYCRR 234.4 (a)	41	Testing and

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H-PRINT	6NYCRR 234.4 (b)	42	monitoring methods Testing and monitoring - test methods
FACILITY	6NYCRR 234.4 (c)	30, 31, 32	Testing and monitoring - continuous monitoring requirements
H-PRINT	6NYCRR 234.4 (c)	43	Testing and monitoring - continuous monitoring requirements
H-PRINT	6NYCRR 234.5	44	Prohibition of sale or specification
FACILITY	6NYCRR 234.5 (a)	33	Prohibition of sale or specification
H-PRINT	6NYCRR 234.6	45	Handling, storage and disposal of VOCs
H-PRINT	6NYCRR 234.7	46	Recordkeeping requirements
H-PRINT	6NYCRR 234.8	47	Opacity

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units,

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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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring

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instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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.

40 CFR Part 68

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

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In addition to Title V, ABX INNOVATIVE PACKAGING SOLUTIONS LLC has been determined to be subject to the following regulations:

40 CFR 63.829 (d)

This rule requires that owners or operators of each facility seeking designation as an area source must maintain records of all required measurements and calculations needed to demonstrate compliance with the criteria specified in § 63.820(a)(2). These criteria specify that to be designated an area source under this subpart the facility must use less than 9.1 Mg (10 tons) of each individual HAP and 22.7 Mg (25 tons) of total HAP compounds per rolling 12-month period. Records to be maintained include the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

40 CFR Part 63, Subpart ZZZZ

Subpart ZZZZ applies to recirculating internal combustion engines. Sources subject to Subpart ZZZZ must limit emissions of carbon monoxide and formaldehyde. Sources must also comply with work practice standards and operating limits.

6 NYCRR 201-1.15

The existence of a valid permit shall not be construed as authorizing construction if construction is not commenced within 18 months after the date of permit issuance, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time as determined by the department. Up to an 18-month extension may be granted by the department upon a showing of good cause in a written request by the facility owner or operator. The department may suspend, modify or revoke the permit or registration pursuant to Part 621 of this Title if construction or modification has not commenced within 18 months of issuance of such permit or registration, or construction has been discontinued for a period of more than 18 months at any point after issuance of such permit or registration.

6 NYCRR 201-6.4 (f)

This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 201-7.1

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6 NYCRR 202-2.4 (a) (3)

Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the specified schedule, in this regulation beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued.

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6 NYCRR 211.1

This regulation requires that 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.

6 NYCRR 212-1.6 (a)

This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 227-1.3 (c)

This subdivision requires that all stationary combustion installations subject to this subpart perform an annual tune-up.

6 NYCRR 227-1.4 (a)

This subdivisions sets the opacity standard for subject stationary combustion installations.

6 NYCRR 229.3 (e) (2) (v)

This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6 NYCRR 229.5 (d)

This section requires facilities subject to the requirements under Part 229.3, to maintain a record of the capacity of the volatile organic liquid storage tanks, in gallons, for a period of 5 years.

6 NYCRR 231-11.2 (b)

This subdivision is referred to as the "Reasonable Possibility" provisions. This citation lists the record keeping requirements for insignificant modifications that are less than 50% of the applicable significant project threshold including excluded emissions as defined in Part 231-4.1(b)(40)(i)(c).

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6 NYCRR 231-11.2 (c)

This citation lists the record keeping requirements for insignificant modifications that are greater than 50% of the threshold including excluded emissions as defined in 231-4.1(b)(40)(i)(c) of this Part.

6 NYCRR 234.1 (c)

This regulation states that a printing process that is subject to the provisions of this Part will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.

6 NYCRR 234.3 (a) (1) (ii) ('d')

This regulation specifies the applicable overall removal efficiency (ORE) for printing operations subject to controls under this Part.

6 NYCRR 234.3 (a) (1) (ii) ('e')

This regulation specifies the applicable overall removal efficiency (ORE) for printing operations subject to controls under this Part.

6 NYCRR 234.4 (a)

This regulation requires that printing processes that use control equipment to comply with the provisions of Part 234 must test and monitor the control equipment to ensure the overall removal efficiency.

6 NYCRR 234.4 (b)

This regulation sets forth the testing methods and procedures to be used for facilities subject to the requirements of Part 234.

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6 NYCRR 234.4 (c)

This regulation specifies that continuous monitoring equipment is required for the following: Combustion zone temperature of all oxidizers; inlet temperature at the catalytic oxidizer bed; break-through of VOC on a carbon adsorption unit; and any other continuous monitoring or recording device required by the Department.

6 NYCRR 234.5

This regulation requires that 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.

6 NYCRR 234.5 (a)

This regulation states that 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.

6 NYCRR 234.6

This regulation specifies the following:

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

- (a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

6 NYCRR 234.7

This regulation sets forth the record keeping requirements for facilities subject of the requirements of Part 234.

6 NYCRR 234.8

This regulation requires that emissions from a unit subject to Part 234 shall not have an

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opacity greater than 10%.

Compliance Certification

Summary of monitoring activities at ABX INNOVATIVE PACKAGING SOLUTIONS LLC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	34	record keeping/maintenance procedures
FACILITY	4	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
H-PRINT/-/02A	48	work practice involving specific operations
Z-MISCL/EPB02	51	monitoring of process or control device parameters as surrogate
Z-MISCL	50	intermittent emission testing
C-OMBUS	39	record keeping/maintenance procedures
FACILITY	24	monitoring of process or control device parameters as surrogate
S-OLVNT	49	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
FACILITY	28	intermittent emission testing
FACILITY	29	intermittent emission testing
H-PRINT	41	record keeping/maintenance procedures
H-PRINT	42	record keeping/maintenance procedures
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	monitoring of process or control device parameters as surrogate
H-PRINT	43	record keeping/maintenance procedures
H-PRINT	44	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures
H-PRINT	45	record keeping/maintenance procedures
H-PRINT	46	record keeping/maintenance procedures
H-PRINT	47	monitoring of process or control device parameters as surrogate

Basis for Monitoring

6 NYCRR Part 201-7 Emissions Capping

- 6 NYCRR 201-7.1 – To cap-out of New Source Review requirements for a major modification to an existing major source, a 39.9 tpy cap on VOC emissions from Press Line 251 (Emission Unit H-PRINT, Emission Source PP001) was established at the time of permitting. To demonstrate compliance with this emissions cap, a monitoring conditions is included requiring monthly emissions monitoring, recordkeeping, and annual reporting. Compliance with this cap is determined on a 12-month rolling basis using material usage, mass balance calculations, and testing data. A new process (02A) was created to reflect PP001 operating under this emission cap.

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Please note that this modification and emissions cap originally included Press Line 563 (ES PP002) which was shut-down and removed from the facility in 2014. The emissions capping condition has been updated accordingly to reflect the removal of ES PP002.

6 NYCRR Part 211 General Prohibitions

- 6 NYCRR 211.2 - This condition specifies the monitoring and recordkeeping to ensure compliance with the 20 percent opacity emissions limit. This monitoring condition ensures compliance with this limit through daily visual observations. The daily monitoring frequency for visual observations is justified because the rule does not specify a monitoring frequency and the condition requires performance of a Method 9 test if visible emissions are observed during two consecutive visual observations.

6 NYCRR Part 212 General Process Emission Sources

- 6 NYCRR 212-1.6(a) - Monitoring of opacity. The facility is responsible to ensure that the emissions from any of their stacks do not exceed 20% opacity. Visual observations of the emissions will be conducted daily during typical operations for the associated emission source, process, etc. Any time excess emissions occur for an extended period of time, the facility will be required to perform a Method 9 assessment to determine if the opacity requirement is met. If opacity is not met the facility must perform corrective actions. Records shall be kept on site and reports are submitted to the department semi-annually.

A more stringent opacity limit for graphic arts operations (10%) applies to Emission Unit H-PRINT which is specified in a condition under 6 NYCRR 234.8.

- 6 NYCRR 212-1.4(a) – The plastic bag extrusion lines are exempt from permitting under 6 NYCRR 201-3.2(c)(36) and therefore are not subject to Part 212 per the exemption in this citation.
- 6 NYCRR 212-1.4(l)(p) – Per these paragraphs, process operations subject to 6 NYCRR Part 234 that do not emit A-rated air contaminants are not subject to Part 212. The graphic arts processes under Emission Unit H-PRINT are subject to Part 234 and does not emit any High Toxicity Air Contaminants (HTACs) under 6 NYCRR 212-2.2. Therefore, these processes are not subject to the requirements of Part 212.
- 6 NYCRR 212-2.3(a) – The electrostatic film treaters are subject to the air cleaning requirements under 6 NYCRR Part 212-2.3(a) for emissions of ozone. The emission rate potential for ozone is greater than 1 lbs/hour but less than 10 lbs/hour. It is assumed that ozone is B-rated and therefore the facility must demonstrate compliance with the associated NAAQs. However, as noted in Section V(C)(4) of DEC Program Policy DAR-1, at this time there is not an appropriate model to calculate ozone impacts from a single source.

Additionally, ozone emissions are controlled using ozone depletion units and are presumed to meet the specified degree of air cleaning. Therefore, no specific requirements for these sources or controls are included under this Part.

- 6 NYCRR 212-2.4(b) - This citation limits particulate emissions to 0.05 gr/dscf for process sources subject to 6 NYCRR Part 212. No compliance method is specified in the regulation. Based on the anticipated emissions from material handling using the product use bins and the application of fabric filter controls, these sources are not anticipated to contravene the standard. Therefore, a monitoring condition has been included for subject points requiring a Method 5 stack test to confirm compliance upon request by the Department.

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6 NYCRR Part 225 Sulfur in Fuel

- 6 NYCRR 225-1.2(d) – This citation limits sulfur content for distillate fuels. A monitoring condition is included consistent with the monitoring in the regulation under 6 NYCRR 225-1.6.

6 NYCRR Subpart Part 226-1 Solvent Cleaning Operations

- 6 NYCRR 226 – The facility owns and operates small parts washers which are subject to requirements under this Subpart. These sources are exempt from permitting and therefore, not included in the facility permit. Accordingly, the applicable requirements are not listed although the sources remain subject to the rule.

6 NYCRR Part 227 Stationary Combustion Installations

- 6 NYCRR 227-1.3(c) – Specifies the annual tune-up requirement for stationary combustion installations subject to Subpart 227-1 consistent with the regulation.
- 6 NYCRR 227-1.4(a) – Specifies the applicable opacity limit for stationary combustion installations. A monitoring condition has been included requiring an annual Method 9 test for the natural gas-fired boiler to demonstrate compliance.

6 NYCRR Part 229 Solvent Storage Tanks

- 6 NYCRR 229.3(e)(2)(v) – Per 6 NYCRR 229.1(e)(8), VOC storage tanks with a capacity of less than 10,000 gallons at facilities with a VOC PTE greater than 50 tons per year must comply with the control requirements of 6 NYCRR 229.3(e)(2)(v). A monitoring condition has been included for the facility storage tanks requiring annual visual verification that the tanks are equipped with conservation vents in accordance with this citation.
- 6 NYCRR 229.5(d) – A monitoring condition has been included for this citation requiring the facility to maintain records of each volatile organic liquid storage tank subject to 6 NYCRR 229.3(e) and verify these records annually.

6 NYCRR Part 234 Graphic Arts Processes

- 6 NYCRR 234.3(a)(1)(ii)(d)&(e) - For the flexographic printing operations subject to Part 234 the facility will meet the level of control specified in lieu of meeting the VOC content limits under 6 NYCRR 234.3(a)(1)(i). This citation specifies the minimum overall VOC control efficiency required to comply with the requirements under 6 NYCRR Part 234 for flexographic printing operations based on the date of installation. The overall removal efficiency (ORE) for each printing press is as follows:
 - Press Line 251 (ES PP001) = 75%
 - Press Line 271 (ES 00271) = 80%
 - Press Line 272 (ES 00255) = 75%
 - Press Line 253 (ES PP004) = 75%
 - Press Line 257 (ES 00257) = 80%
 - Press Line 253 (ES 00253) = 80%

Compliance with the ORE requirements are met through Permanent Total Enclosures (PTEs) for the press lines and the use of three regenerative thermal oxidizers (OX001-OX003). Multiple monitoring conditions are included under this citation and 234.4(c)(1) to ensure that the required ORE for each press line is continuously met. The ORE for each press line has been demonstrated through initial capture and destruction efficiency testing of the PTEs and oxidizers. Subsequent testing must be completed at a minimum once every five-year permit term. Testing must be conducted in accordance with the requirements of 234.4(c)(b) and EPA test methods.

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- 6 NYCRR 234.4(c)(1) – Per this citation the facility must continuously monitor and record the regenerative thermal oxidizer combustion zone temperature to ensure the ORE for the press lines is met at all times. The temperature limits are based on the most recent capture and destruction efficiency test report and may be modified based on future testing.
- 6 NYCRR 234.8 – This citation specifies the opacity limit for graphic arts operations. No specific monitoring is specified in the regulation. Visual observations of the emissions will be conducted daily during typical operations for the associated emission source, process, etc. Any time excess emissions occur for an extended period of time, the facility will be required to perform a Method 9 assessment to determine if the opacity requirement is met. If opacity is not met the facility must perform corrective actions. Records shall be kept on site and reports are submitted to the department semi-annually.

40 CFR 63, Subpart A NSPS General Provisions

- 40 CFR 60, Subpart A – Specifies the general requirements for monitoring, recordkeeping, and reporting for operations subject to Federal National Emissions Standards for Hazardous Air Pollutants (NESHAP).

40 CFR 63, Subpart KK – Printing and Publishing Industry NESHAP

- 40 CFR 63.820(a)(2)– PTE HAP emissions (speciated and total) are below Major Source Thresholds and is therefore the facility is not subject to this Subpart as an area source of HAP emissions. Facility PTE emissions account for the use of Federally Enforceable controls used to comply with VOC RACT requirements. Continued area source status is met through complying with the VOC RACT requirements and keeping records of submitted applications and supporting calculations.

The facility must continue to comply with the recordkeeping requirements in 40 CFR 63.829(d) per the exemption under 40 CFR 63.820(a)(2).

40 CFR 63, Subpart JJJJ – Paper and Other Web Coating NESHAP

- 40 CFR 63.3280 – The facility is an area source of HAP emissions and therefore not subject to this Subpart.

40 CFR 63, Subpart ZZZZ Reciprocating Internal Combustion Engine NESHAP

- The Department has not accepted delegation of 40 CFR 63, Subpart ZZZZ. Therefore, a single general condition regarding the applicability of this Subpart is included for subject sources (emergency generators). Please note that the applicable sources are exempt from permitting and not listed as an emissions source in the permit.

40 CFR 64, Compliance Assurance Monitoring

- 40 CFR Part 64 - Emission Unit H-PRINT is:
 - Required to meet 75% or 80% overall removal efficiency of VOCs under 6 NYCRR 234.3(a)(1)(ii)(d)&(e) as discussed above;
 - Uses control devices to capture and control VOC emissions in accordance with this limit; and,
 - Has pre-control potential emissions of VOC greater than 50 tons per year.

Therefore, the permanent total enclosures and RTOs under Emission Unit H-PRINT are tentatively subject to CAM requirements for VOCs. However, per the definition under 40 CFR 64.1, a *Control Device* under CAM means equipment "...that is used to destroy or remove air pollutant(s) prior to discharge..." and "...does not include passive control measures...". Since the permanent total enclosures do not destroy or remove VOCs from the exhaust stream, they qualify as passive control

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measures rule, and do not meet the definition of a control device under CAM. Therefore, the permanent total enclosures are not subject to CAM requirements.

Per 40 CFR 64.2(b)(1)(vi), emissions limitations or standards where continuous monitoring is required by the ATV permit are not subject to CAM. As discussed under 6 NYCRR 234.3(a)(1)(ii)(d)&(e) above, a monitoring condition is included for the RTOs requiring continuous monitoring of RTO temperature to ensure that the VOC overall removal efficiency requirement is met. This temperature limit/range is established for each RTO based on the initial stack test and will be reevaluated during subsequent testing (required once every five years.) Therefore, because a continuous compliance determination method is specified in the permit for the RTOs which is directly correlated with the destruction efficiency verified during testing, the RTOs are exempt from CAM per 40 CFR 64.2(b)(1)(vi).

Per the above, references to CAM plan requirements have been removed from the permit as part of this renewal.