

**Division of Air Resources  
Permit Review Report**

**Permit ID: 9-1422-00093/00035**

**Renewal Number: 2**

**Modification Number: 2 11/06/2020**

**Facility Identification Data**

Name: INTERNATIONAL IMAGING

Address: 310 COMMERCE DR

AMHERST, NY 14228

**Owner/Firm**

Name: INTERNATIONAL IMAGING MATERIALS INC

Address: 310 COMMERCE DR

AMHERST, NY 14228-2303, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

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310 COMMERCE DR

BUFFALO, NY 14228

Phone:7166916333

**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**

The purpose of this modification is the addition of a new coating machine at the facility and to incorporate the requirements of 40 CFR 63 JJJ into the permit.

**Attainment Status**

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INTERNATIONAL IMAGING is located in the town of AMHERST in the county of ERIE. 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
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL 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:**

IIMAK is a manufacturer of thermal transfer ribbons. IIMAK coats polyester film with wax and solvent-based backings and inks for use in bar code applicators, color printers, and facsimile machines. In order to manufacture these products, solvent-based coatings are manufactured and applied to the film using coating machines.

The facility consists of five emission units within two areas designated Plants 1 & 2 on the same contiguous property:

X-OXDZR: This emission unit includes all coating machines, parts washers, slitting machines, oxidizers, and the toluene recovery system (TRS) located within Plant 1 and Plant 2. The TRS has the capability to receive and treat approximately half of the facility-wide emissions.

1-CBS01: This emission unit has the following chemical bulk storage tanks: (1) 15,000 gallon storage tank for methyl ethyl ketone; (2) 10,000 gallon storage tank for either acetone or toluene; and (3) 10,000 gallon storage tank for toluene. These tanks are located in a vault below Plant #2 and are each vented to atmosphere.

1-BOILR: 2 - 24.5 mmBTU/hr natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying;

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

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

**Permit Structure and Description of Operations**

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The Title V permit for INTERNATIONAL IMAGING

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.

INTERNATIONAL IMAGING is defined by the following emission unit(s):

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

Emission unit 1CORON is associated with the following emission points (EP):

00028, 00029, 00030

Process: CR1 is located at Building 2 - This process consists of one corona treatment unit that is connected to the MSC-1 coating machine. The corona treatment unit uses an electrical process that pretreats the film and generates ozone as a byproduct. The ozone is collected in a hood and vented to a stack on the Plant No. 2 roof.

Process: CR2 is located at Main floor, Building 1 - Process consists of one corona treatment unit that is connected to the 89-3 coating machine. The unit is an electrical process that pretreats the film and generates ozone. The ozone is collected in a hood and vented to a stack on the Plant No. 1 roof.

Process: CR3 is located at Main Floor, Building 1 - Process consists of two corona treatment units that are connected to the 89-2 and 89-3 coating machines. The corona treatment unit use an electrical process that pre-treats the film and generates ozone. The ozone is collected in hoods and vented to a stack on the Plant No. 1 roof.

Emission unit 1BOILR - Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.

Emission unit 1BOILR is associated with the following emission points (EP):

00020, 00021

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Process: B20 is located at MAIN FLOOR, Building 2 - Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.

Process: B21 is located at MAIN FLOOR, Building 2 - Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.

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

Emission unit 1CBS01 is associated with the following emission points (EP):  
00023, 00024, 00025

Process: T01 is located at OUTSIDE BUILDING, Building 2 - This process consists of three (3) tanks contained within a vault below Plant #2. Each are vented to atmosphere. The solvents are used in the manufacturing of thermal transfer ribbon inks.

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

Emission unit XOXDZR is associated with the following emission points (EP):  
00008, 00014, 00022, 00027, 0032A, 0032B, 0032C

Process: OXA is located at Building 1 - This process involves the venting of all air emissions from the coating and slitting machines in Plant 1 to Oxidizer #4 or Oxidizer #2, which serves as the backup unit.

Process: OXB is located at Building 2 - This process involves the venting of air emissions from the coating machines and parts washers in Plant 2 to Oxidizer #4 or Oxidizer #3, which serves as the backup unit.

Process: OXC is located at Building 2 - This process involves the venting of all air emissions from coating machine MSC-4, identified as emission source 00271, to Oxidizer #4 or Oxidizer #3, which serves as the backup unit.

Process: TRS is located at Main Floor, Building 2 - This process consists of a Toluene Recovery System (TRS) which removes solvent from the emissions from the MSC coating machines through a carbon adsorption system and returns it to the process. Oxidizers 3 & 4 will serve as backups to the TRS system.

Emission unit 1WEIGH - A mixture of solid pigment resins and waxes are weighed at weigh stations and are then mixed and melted at the mix tanks. Dust from the weighing process is collected into dust

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collectors.

Emission unit 1WEIGH is associated with the following emission points (EP):  
00018, 00019

Process: W01 is located at main floor, Building 1 - A mixture of solid pigment resins and waxes are weighed at weigh stations and are then mixed and melted at the mix tanks. Dust from the weighing process is collected into dust collectors.

**Title V/Major Source Status**

INTERNATIONAL IMAGING is subject to Title V requirements. This determination is based on the following information:

International Imaging Inc. (IIMAK) has the potential-to-emit several air contaminants (see below) at rates greater than the major source thresholds as defined by Title V of the Clean Air Act Amendments of 1990, making the facility a major source and requiring the issuance of this Air Title V permit.

The specific contaminants and the major source threshold for each are:

- Volatile Organic Compounds (VOC) - 50 tons per year
- Total Hazardous Air Pollutants (HAP) - 25 tons per year
- Toluene - 10 tons per year
- Methyl Ethyl Ketone - 10 tons per year

**Program Applicability**

The following chart summarizes the applicability of INTERNATIONAL IMAGING with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

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**NOTES:**

**PSD** Prevention of Significant Deterioration (40 CFR 52, 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 NOx 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 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.

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**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.

<b>SIC Code</b>	<b>Description</b>
3955	CARBON PAPER AND INKED RIBBONS

**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.

<b>SCC Code</b>	<b>Description</b>
1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/ INDUSTRIAL COMMERCIAL/ INSTITUTIONAL BOILER - NATURAL GAS
3-15-010-01	10-100 MMBtu/Hr PHOTOGRAPHIC EQUIPMENT PHOTOCOPYING EQUIPMENT MANUFACTURING Resin Transfer/Storage
3-16-050-03	PHOTOGRAPHIC PRODUCT MANUFACTURING SURFACE TREATMENTS
3-90-006-89	CORONA DISCHARGE TREATMENT IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE General
4-05-002-05	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Other non-dryer printing - letterpress
4-05-007-01	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Solvent Storage: General

**Facility Emissions Summary**

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



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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
000630-08-0	CARBON MONOXIDE		4.14		
000067-56-1	METHYL ALCOHOL		0.21		
0NY210-00-0	OXIDES OF NITROGEN		10.29		
0NY075-02-5	PM 2.5	0.06			
0NY075-00-5	PM-10	0.06			
007446-09-5	SULFUR DIOXIDE		0.04		
000108-88-3	TOLUENE		19.1		
0NY100-00-0	TOTAL HAP	19.43			
0NY998-00-0	VOC		176		
001330-20-7	XYLENE, M, O & P MIXT.		0.11		

**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)**

All terms and conditions in this permit required by the Act or any applicable requirement,

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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.

The owner or operator of the permitted facility must maintain all required records on-site

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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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
-- FACILITY	ECL 19-0301	54	Powers and Duties of the Department with respect to air pollution control
1-BOILR	40CFR 60-Dc.48c(a)	34	Reporting and Recordkeeping Requirements.
1-BOILR	40CFR 60-Dc.48c(g)	35	Reporting and Recordkeeping Requirements.
1-BOILR	40CFR 60-Dc.48c(g)(2)	36	Alternative recordkeeping
1-BOILR	40CFR 60-Dc.48c(g)(3)	37	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 63-A.6(e)	2 -5, 2 -6	Part 63 Operation and Maintenance Requirements
X-OXDZR	40CFR 63-JJJJ.3320(b)(1)	2 -10	Paper and Other Web Coating NESHAP - Emission Standards - Organic HAP applied
X-OXDZR/-/OXB/0002A	40CFR 63-JJJJ.3321(a)	2 -14	Paper and Other Web Coating NESHAP - Operating limits
X-OXDZR/-/OXB/0003A	40CFR 63-JJJJ.3321(a)	2 -15	Paper and Other Web Coating NESHAP - Operating limits
X-OXDZR/-/OXB/0004A	40CFR 63-JJJJ.3321(a)	2 -16	Paper and Other Web Coating NESHAP - Operating limits
X-OXDZR/-/TRS/00321	40CFR 63-JJJJ.3350(d)(1)	2 -19	Paper and Other Web Coating NESHAP - Solvent recovery unit monitoring - CEMS option
X-OXDZR	40CFR 63-JJJJ.3350(f)	2 -11	Paper and Other Web Coating NESHAP - Monitoring of capture systems
X-OXDZR/-/OXB	40CFR 63-JJJJ.3360(e)	2 -13	Paper and Other Web Coating NESHAP - Performance tests to determine control device efficiency
X-OXDZR	40CFR 63-JJJJ.3400(c)(2)	2 -12	Paper and Other Web Coating NESHAP - Semiannual compliance report contents.
FACILITY	40CFR 63-JJJJ.Tbl 2	2 -7	Subpart A requirements for

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FACILITY	40CFR 68	19	Subpart JJJJ Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10, 2 -2	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	55	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 31, 32	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16, 2 -3	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 Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201- 6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8, 2 -1	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	29	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	2 -4	General Prohibitions - visible emissions limited.
1-WEIGH	6NYCRR 212-1.6(a)	39	Limiting of Opacity
1-CORON	6NYCRR 212-2.3(a)	2 -8	Federal SIP Criteria air contaminants

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1-WEIGH	6NYCRR 212-2.4(b)	40	applicable to Table 3 Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
1-BOILR	6NYCRR 227-1.3(a)	33	Smoke Emission Limitations.
X-OXDZR	6NYCRR 228-1.3(a)	42	Surface Coating General Requirements-
X-OXDZR	6NYCRR 228-1.3(b)(1)	43	Opacity General Requirements
X-OXDZR	6NYCRR 228-1.3(c)	44	- Record Keeping Surface Coating General Requirements-
X-OXDZR	6NYCRR 228-1.3(d)	45	Prohibitions Surface Coating General Requirements-
X-OXDZR	6NYCRR 228-1.4(d)	46	Handling, storage and disposal
X-OXDZR	6NYCRR 228-1.5(c)	48, 2 -9	Class D Coating Lines Calculation of overall removal efficiency of an air cleaning device
X-OXDZR/-/TRS/00321	6NYCRR 228-1.5(c)	2 -17, 2 -18	Calculation of overall removal efficiency of an air cleaning device
FACILITY	6NYCRR 228-1.6(d)	30	Surface coating control equipment test methods

**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

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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, 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



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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 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 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

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 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

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

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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**

In addition to Title V, INTERNATIONAL IMAGING has been determined to be subject to the following regulations:

40 CFR 60.48c (a)

This regulation requires the owner and operator of each affected facility to submit notification of the date of construction or reconstruction, anticipated startup, and actual startup of the facility. The notification must include the following information:

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

40 CFR 60.48c (g)

The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40 CFR 60.48c (g) (2)

This regulation allows the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO<sub>2</sub> standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

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40 CFR 60.48c (g) (3)

This condition states the recordkeeping requirements for facilities only combusting fuels that do not have an emission standard

40 CFR 63.3320 (b) (1)

This condition defines the various monitoring and testing measures which will indicate compliance with the minimum overall VOC removal efficiency rate of 95% for the oxidizers. The oxidizers must undergo performance testing once every five years.

40 CFR 63.3321 (a)

This citation states the operating requirements for web coating lines which use add on control devices.

40 CFR 63.3350 (d) (1)

This condition defines the various monitoring and testing measures which will indicate compliance with the minimum overall VOC removal efficiency rate of 95% for the toluene recovery system. The system must undergo performance testing once every five years.

40 CFR 63.3350 (f)

This citation states the requirements for capture system monitoring.

40 CFR 63.3360 (e)

This citation states the requirement to conduct a performance test to determine control device efficiency.

40 CFR 63.3400 (c) (2)

This condition spells out the information that needs to be submitted in the semi-annual compliance reports that must be submitted in order to show that the facility has been meeting the emission limits contained in this subpart.

40 CFR 63.6 (e)

These conditions detail the actions the facility will follow according to their Startup

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Shutdown Malfunction (SSM) Plan in case of control technology (oxidizer or toluene recovery system (TRS)) malfunction

40 CFR 63.Tbl 2

This condition refers the applicant to the requirements of 40 CFR 63 Subpart A that are applicable to facilities subject to 40 CFR 63 Subpart JJJJ.

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 212-2.3 (a)

Table 3 of 212-2.3 describes the reduction in emissions required for a criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of controlled applied.

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 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 228-1.3 (a)

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This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (b) (1)

This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (c)

This citation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

6 NYCRR 228-1.3 (d)

This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.4 (d)

6 NYCRR 228-1.5 (c)

This condition defines the various monitoring and testing measures which will indicate compliance with the minimum overall VOC removal efficiency rate of 90% for the toluene recovery system. The system must undergo performance testing once every five years. (Federal regulation 40CFR63 JJJJ requires 95% removal efficiency.)

6 NYCRR 228-1.6 (d)

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**Compliance Certification**

**Summary of monitoring activities at INTERNATIONAL IMAGING:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
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1-BOILR	34	record keeping/maintenance procedures
1-BOILR	35	record keeping/maintenance procedures
FACILITY	2-5	record keeping/maintenance procedures
FACILITY	2-6	record keeping/maintenance procedures
X-OXDZR	2-10	record keeping/maintenance procedures
X-OXDZR/-/OXB/0002A	2-14	monitoring of process or control device parameters as surrogate
X-OXDZR/-/OXB/0003A	2-15	monitoring of process or control device parameters as surrogate
X-OXDZR/-/OXB/0004A	2-16	monitoring of process or control device parameters as surrogate
X-OXDZR/-/TRS/00321	2-19	monitoring of process or control device parameters as surrogate
X-OXDZR	2-11	record keeping/maintenance procedures
X-OXDZR/-/OXB	2-13	intermittent emission testing
X-OXDZR	2-12	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	25	work practice involving specific operations
FACILITY	26	work practice involving specific operations
FACILITY	27	work practice involving specific operations
FACILITY	28	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
1-WEIGH	39	monitoring of process or control device parameters as surrogate
1-CORON	2-8	record keeping/maintenance procedures
1-WEIGH	40	monitoring of process or control device parameters as surrogate
1-BOILR	33	monitoring of process or control device parameters as surrogate
X-OXDZR	42	monitoring of process or control device parameters as surrogate
X-OXDZR	43	record keeping/maintenance procedures
X-OXDZR	44	record keeping/maintenance procedures
X-OXDZR	45	record keeping/maintenance procedures
X-OXDZR	46	record keeping/maintenance procedures
X-OXDZR	2-9	record keeping/maintenance procedures
X-OXDZR	48	record keeping/maintenance procedures
X-OXDZR/-/TRS/00321	2-17	record keeping/maintenance procedures
X-OXDZR/-/TRS/00321	2-18	intermittent emission testing
FACILITY	30	record keeping/maintenance procedures
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**Basis for Monitoring**

Most of the monitoring requirements contained in this permit are based on specific monitoring methods and observations as prescribed in the applicable rules. Facility

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specific monitoring conditions were written to assure that reliable information is obtained representing the facility's compliance status.

### EMISSION CAPS

The emissions caps for presses MSC 1-5 were added in previous permit modifications. It has since been determined that emission capping is not necessary at this facility because emission controls at the facility are required by federally enforceable conditions such that emissions are kept below 50 tons per year. The existing emissions caps remain in the permit. No emissions cap will be added for the new press MSC 6.

These conditions detail the four separate volatile organic compound (VOC) emission caps for different portions of the facility. These conditions document the specific emission sources subject to each cap and detail the required methods of record keeping and reporting. The facility is required to maintain monthly records and to submit an annual certification verifying compliance with the limits.

### PART 212

Emission units 1-CORON and 1-WEIGH contain process sources at the facility and are subject to Part 212 requirements.

1-WEIGH has 2 weigh stations, where solid pigments, resins and waxes are weighed, mixed and melted. Per Part 212 IIMAK must limit the opacity and particulate loading from this source. Dust collectors are employed as control devices.

1-CORON has two corona treatment units connected to coating machines MSC-1, and 89-3. Polyester film, which passes through the units, is subjected to a corona treatment process that generates ozone. The ozone is collected in hoods and vented to the roofs of Plant No. 1 & Plant No. 2. IIMAK completed an air dispersion modeling analysis, and submitted a summary via email dated February 26, 2016, the modeling determined that the maximum off-site ozone concentration from a corona treatment unit is less than the National Ambient Air Quality Standard. Use of the corona treatment units is limited to the use of one unit at a time to limit ozone.

### PART 228

As a facility that operates Class D coating lines specifically in this case for pressure sensitive tape and label surface coating operations IIMAK is subject to the requirements of 6 NYCRR Part 228.



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IIMAK makes use of add-on VOC controls in order to use coatings which exceed the VOC content limits at application specified in the table D-2 of Subpart 228-1.4. Under Subpart 228-1.5 the add-on controls, which include Thermal oxidizers and a toluene recovery system, must achieve a minimum of 90 % VOC removal efficiency. Federal regulation 40CFR63 JJJJ requires 95% removal efficiency. By complying with the federal regulation IIMAK will also maintain compliance with the control requirements in Part 228. The facility is still subject to the General Requirements of Subpart 228-1.3.

**STARTUP, SHUTDOWN & MALFUNCTION**

IIMAK was required to submit a written startup, shutdown, and malfunction (SSM) plan under 40CFR 63.6(e), Subpart A. The SSM plan describes procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction. The purpose of the SSM plan is to reduce the reporting burden associated with periods of startup, shutdown, and malfunction while minimizing emissions during such a SSM event consistent with safety and good air pollution control practices. These permit conditions detail the actions the facility will follow according to their SSM plan in case of control technology (oxidizer or toluene recovery system (TRS)) malfunction.

A SSM plan for coating lines MSC-1 through MSC-5 was approved in 2016 and allows a 4-hour operating window during control equipment malfunction events where emissions must then be routed to backup control equipment or the unit must be shut down. This 4-hour window was intended to allow IIMAK to complete a product roll that is already in progress when the malfunction occurs. A 4-hour time period is equivalent to the duration of the longest running product roll. According to IIMAK a product roll that is stopped abruptly while in progress irreparably damages the product.

A SSM plan for coating line MSC-6 was approved with the current permit modification. A 1-hour operating window was allowed for a malfunction event after which emissions must be routed to backup control equipment or the unit must initiate a shut down process. The 1-hour limit will be applied to coating lines MSC-1 through MSC-5 with the upcoming permit renewal.

**NESHAP 40CFR 63 SUBPART JJJJ**

After performing a self-audit IIMAK determined that they were subject to the requirements of the NESHAP JJJJ. DEC agreed with the assessment that JJJJ applied to

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the facility and IIMAK submitted a permit modification application on May 14, 2019 to add this rule to the permit along with the addition of a new coating line (MSC-6).

IIMAK submitted its initial Title V permit application on November 30, 1998 and met the criteria for an “affected source” (i.e., a Major Source for Toluene and MEK; PTE>10TPY) in the 1990. The application included emission calculations demonstrating its HAP “Potential to Emit” exceeded the limits for an “affected source”. Therefore, IIMAK is an “existing affected source” prior to September 13, 2000 despite Subpart JJJJ requirements not previously being included in the permit.

At existing major sources of Hazardous Air Pollutants (HAP) where web coating lines are operated, the capture system and the air cleaning device must provide for an overall reduction in organic HAP emissions of at least 95 percent each month. The overall removal efficiency consists of two components and is calculated as the product of the capture efficiency of the gas collection system and the destruction efficiency of the control equipment.

Emission unit X-OXDZR includes six multi-station coaters (MSC-1 through MSC-6), identified in the permit as emission sources 00221, 00222, 00224, 00271, 00311, and 00312. The facility has documented 100% capture of emissions via permanent total enclosure (PTE) on each of the existing coaters. IIMAK must conduct a Method 204 test on the PTE equipped to emission source 00312, which will be constructed as of this permit modification, within 180 days of startup of the unit.

The capture efficiency testing of the emission sources need only be repeated, in accordance with 40CFR60, Appendix A, Method 204, if physical changes to the air distribution system occur. Physical changes to the air distribution system include, but are not limited to, adding stations to a coating line, 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.

Performance testing for the control equipment was completed on April 14, 2017 and demonstrated average destruction efficiency exceeding 95 percent. Subsequent performance testing is required as detailed in the permit. Continuous compliance with the 95 percent overall removal efficiency will be assured by: (1) maintaining and operating the capture system as initially designed by the manufacturer, and (2) maintaining the destruction/removal efficiency of the control equipment as outlined elsewhere in this permit.

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Organic HAPs are expected to be reduced at the same rate as total VOCs. So by maintaining compliance with the NESHAP, IIMAK will also be considered in compliance with the 90% VOC reduction required in 6 NYCRR Part 228.

Affiliated operations to Subpart JJJJ include: (1) mixing or dissolving of coating ingredients prior to application; (2) coating mixing for viscosity adjustment, color tint or additive blending, or pH adjustment; (3) cleaning of coating lines and coating line parts; (4) handling and storage of coatings and solvents; and (5) conveyance and treatment of wastewater.

1-CBS01 and 1-WEIGH fit this description but are not subject to Subpart JJJJ. Section II.B of the preamble to the final rule states “Since we were not able to identify emissions reductions for affiliated operations, we believe it is not appropriate at this time to include them in the affected source in the final rule.”

COMPLIANCE ASSURANCE MONITORING (CAM) 40 CFR PART 64

With the addition of 40 CFR 63 Subpart JJJJ to the permit; the control devices at this facility are now subject to a NESHAP promulgated after November 15, 1990. As such, CAM no longer applies to IIMAK and conditions relating to CAM have been removed from the permit.