

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 1282000185**



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 1-2820-00185/00008  
Mod 0 Effective Date: 03/12/2001 Expiration Date: 03/11/2006  
Mod 1 Effective Date: 07/16/2002 Expiration Date: 03/11/2006

Permit Issued To: LAWSON MARDON PACKAGING USA INC  
1403 FOURTH AVE  
PO BOX O  
NEW HYDE PARK, NY 11040

Contact: LAWSON MARDON PACKAGING USA INC  
1403 FOURTH AVE  
PO BOX O  
NEW HYDE PARK, NY 11040  
(516) 775-8723

Facility: LAWSON MARDON PACKAGING  
1403 4TH AVE  
NEW HYDE PARK, NY 11040

Contact: LAWSON MARDON PACKAGING USA INC  
1403 FOURTH AVE  
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(516) 775-8723

**Description:**

Lawson Mardon Label is a flexographic printing firm, manufacturing labels for consumer and industrial products. All flexible labels produced are for outside customers; thus the products used to manufacture the packaging are dependent upon customer requirements. A printing job begins by preparing the specific ink and coating necessary for that particular customer. These prepackaged materials are blended in containers to meet individual customer specifications and moved to the individual flexographic presses for application on to the packaging material. The Lawson Mardon facility is equipped with seven flexographic printing lines. Hot air dryers are used between the application of different colors and coatings to ensure a quality final product. Any emissions generated by the press dryers are captured and controlled through the use of mainly two catalytic thermal oxidizers, Oxidizer 1 and Oxidizer 3. Oxidizer 2 will continue to be maintained at the facility for standby and emergency operation for control of presses 4,5 and 6. The oxidizers are designed to perform with a minimum VOC destruction efficiency of 90%. The facility's manufacturing operations using VOCs are regulated under 6NYCRR Part 234-Graphic Arts. The facility will ensure an overall reduction of at least 77% of the VOC emissions from the printing and coating activities. The facility's VOC emissions exceed the major source pollutant thresholds

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listed in 6NYCRR Part 201-6. Therefore, the facility is subject to the provisions of Title V.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator:           ROGER EVANS  
  DIVISION OF ENVIRONMENTAL PERMITS  
  SUNY CAMPUS, LOOP ROAD, BUILDING 40  
  STONY BROOK, NY 11790-2356

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_\_\_



**Notification of Other State Permittee Obligations**

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

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

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

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

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

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

Relationship of this Permit to Other Department Orders and Determinations

Facility Inspection by the Department

Applications for Permit Renewals and Modifications

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

**Facility Level**

Submission of Applications for Permit Modification or Renewal-REGION 1

HEADQUARTERS



**DEC GENERAL CONDITIONS**

**\*\*\*\* General Provisions \*\*\*\***

**For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions**

**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**  
**Applicable State Requirement: ECL 3-0301.2(m)**

**Item 2.1:**

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

**Condition 1-1: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 1-1.1:**

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

**Item 1-1.2:**

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

**Item 1-1.3:**

Permits are transferrable with the approval of the department unless specifically prohibited by the statute,



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regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 3: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13(a)**

**Expired by Mod No: 1**

**Item 3.1:**

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

**Item 3.2:**

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

**Condition 1-2: Permit Modifications, Suspensions and Revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.14**

**Item 1-2.1:**

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

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

**Condition 4: Permit Modifications, Suspensions, and Revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.14**

**Expired by Mod No: 1**

**Item 4.1:**

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.



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

**Condition 5: Submission of Applications for Permit Modification or Renewal-REGION 1 HEADQUARTERS**  
**Applicable State Requirement: 6NYCRR 621.5(a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 1 Headquarters  
Division of Environmental Permits  
SUNY Campus, Loop Road, Building 40  
Stony Brook, NY 11790-2356  
(631) 444-0365

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

**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

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Authorized Activity By Standard Industrial Classification Code:



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

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- 53 control requirement
- 54 sampling
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**FEDERALLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.**

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

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

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

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

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

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

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

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

Any person who owns or operates an air contamination

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source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

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

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

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

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

**Item E: Emergency Defense - 6NYCRR Part 201-1.5**

An emergency constitutes an affirmative defense to an action brought 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 and/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;

(3) During the period of the emergency the facility owner and/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 and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the



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emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/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 F: Recycling and Salvage - 6NYCRR Part 201-1.7**

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

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

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

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

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

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

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requirements, regulations, or law.

- Item J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)**  
The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.
- Item K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(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 L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**  
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(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 N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission**

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**Requirements - 6 NYCRR Part 201-6.5(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 O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)**

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(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 Q: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**

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

**Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)**

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

**Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)**

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted

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facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Item T: Severability - 6 NYCRR Part 201-6.5(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 U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)**

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)**

No permit revision will be required for operating changes that contravene an express permit term, provided that such

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changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

**Item W: Permit Shield - 6 NYCRR Part 201-6.5(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;
- iii. The applicable requirements of Title IV of the

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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 X: Reopening for Cause - 6 NYCRR Part 201-6.5(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



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a shorter time period in the case of an emergency.

**Item Y: Required Emission Tests - 6 NYCRR Part 202-1.1**

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

**Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Item AA: Open Fires - 6 NYCRR Part 215**

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

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



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

**FEDERAL APPLICABLE REQUIREMENTS**

**The following conditions are subject to annual compliance certification requirements for Title V permits only.**

**Condition 24: Emission Unit Definition**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

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

**Item 24.1(From Mod 1):**

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

Emission Unit: 0-2USTS

Emission Unit Description:

This Emission Unit is two (2) 3,000- gallon underground tanks for storage for solvent (eg., 80% n-propanol, 20% n.p. acetate).

Building(s): PLANT

**Item 24.2(From Mod 1):**

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

Emission Unit: 1-PRINT

Emission Unit Description:

Seven flexible label production lines and a videojet printing operation routed to three oxidizers at Lawson Mardon Label have been grouped together as a single Emission Unit. This approach will simplify the required compliance certification monitoring and reporting activities. This Emission Unit ( designated 1-PRINT) consists of:

- Press Line 1; captured VOC emissions are exhausted through Oxidizer No. 1.
- Press 2, 3, 4, 5, 6, and 7; captured VOC emissions are exhausted through Oxidizer No. 3
- Press Lines 4, 5 and 6; captured VOC emissions may be

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exhausted through Oxidizer No. 2 as a back up to Oxidizer No.3

-Press 6 Backside Printing Station; captured VOC emissions are exhausted through Oxidizer No.3 and through Oxidizer 2 as a back up.

-One VideoJet Operation; captured VOC emissions are exhausted through Oxidizer No.3

Each press produces a similar product; product production is assigned to an individual line due to equipment and personnel availability, and specific product requirements (eg., size, number of colors). By grouping all flexographic printing and coating lines together as an emission unit, this allows the facility the operational flexibility necessary to adequately meet market demands.

Annual VOC usage and emissions for press Lines 1-7 are presented in Exhibit A.

Annual VOC usage and emissions for the videojet operation are presented in Exhibit B

Natural Gas emission calculations are presented in Exhibit C

Facility Emission Calculations are presented in Exhibit D.

Building(s): PLANT

**Condition 1-1: Recordkeeping and reporting of compliance monitoring Effective between the dates of 07/16/2002 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.5(c)**

**Item 1-1.1:**

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii)The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and



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(vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

**Condition 1-2: Monitoring, Related Recordkeeping, and Reporting Requirements.**

**Effective between the dates of 07/16/2002 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)**

**Item 1-2.1:**

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

**Condition 1-3: Compliance Certification**

**Effective between the dates of 07/16/2002 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)**

**Item 1-3.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-3.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable

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requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If any of the above conditions are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) through (4) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraph (1) through (4) of this section must also be identified in the 6 month monitoring report required above.

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If the permittee seeks to have a violation excused as provided in 201-1.4, the permittee shall report such violations as required under 201-1.4(b). However, in no case may reports of any deviation be on a less frequent basis than those described in paragraphs (1) through (4) above. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

**Condition 1-4: Compliance Certification**

**Effective between the dates of 07/16/2002 and 03/11/2006**

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**Applicable Federal Requirement: 6NYCRR 201-6.5(e)**

**Item 1-4.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-4.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;and
  - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, NY 10007-1866

The address for the RAPCE is as follows:

NYSDEC  
SUNY Campus  
Building 40  
Stony Brook, NY 11790-2356

The address for the BCME is as follows:

NYSDEC  
Bureau of Compliance Monitoring  
and Enforcement  
625 Broadway  
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2002.  
Subsequent reports are due on the same day each year

**Condition 28: Non Applicable requirements**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.5(g)**

**Item 28.1:**

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.



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**Condition 30: Compliance Certification**

**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 202-2.1**

**Item 30.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

**Condition 31: Recordkeeping requirements**

**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 202-2.5**

**Item 31.1:**

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

**Condition 1-5: Notification/Reporting requirements**

**Effective between the dates of 07/16/2002 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 231-2.4**

**Replaces Condition(s) 34**

**Item 1-5.1:**

At least sixty (60) days prior to the scheduled commence operation date of the proposed source project or proposed major facility, the permittee shall submit any changes to the list of offset sources included in this permit. For each such change, the applicant must submit another "Use of Emission Reduction Credits Form" signed by the applicant and an authorized representative of the new offset source.

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**Item 1-5.2:**

The facility shall submit to the DEC Regional office a letter of confirmation that each future emission reduction, if any, used to provide emission offsets for this facility has physically occurred. This letter should be submitted, not less than 10 working days, prior to the facility's scheduled start-up date.

**Item 1-5.3:**

This permit shall be subject to revocation if construction is not commenced within 18 months from the date of issuance of such permit or if construction is discontinued for a period of 18 months or more (excluding any period of time that the permit is subject to challenge in State or Federal court), or if construction is not completed within a reasonable time acceptable to the Department.

**Condition 1-6: Compliance Certification**

**Effective between the dates of 07/16/2002 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.**

**Replaces Condition(s) 35**

**Item 1-6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Lawson Mardon Label will not exceed a usage of 2,922,571 lbs of VOCs annually from printing and coating operations. Maximum VOC emissions from the facility will not exceed 326.09 tons annually.

Reference Test Method: DEPT APPROVED

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

**Condition 36: Compliance Certification**

**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.4(b)(3)**

**Item 36.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 36.2:**



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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall submit to the Department on a quarterly basis a report detailing the following:

- a) A calendar month record of all inks, coating and cleaning solvents used.
  - b) A calendar month record of all 3-hour periods (during operations) during which the actual average temperature of the incinerators more than 50 degrees less than 600 degrees Fahrenheit. If no such periods occur, the report shall state this.
  - c) Total pounds of VOC destroyed by the incinerator
  - d) Total pounds of VOC emitted (amount of VOC employed - amount destroyed)
- 2) The report shall be received by the Department no later than 30 days after the beginning of the following quarter.
- 3) The report shall contain information for all emission points and facility wide emissions
- 4) The report shall be submitted to:  
Regional Air Pollution Control Engineer  
New York State Department of Environmental Conservation  
Region 1  
Building 40, SUNY Campus  
Stony Brook, NY 11790

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2001.

Subsequent reports are due every 3 calendar month(s).

**Condition 1-7: Compliance Certification**  
**Effective between the dates of 07/16/2002 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.6**

**Item 1-7.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

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**Item 1-7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following work practices are prohibited:

- (a) using open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or ink/coating removal;
- (b) storage in open containers of spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;
- (c) use of open containers to store or dispose of inks and/or surface coatings; or
- (d) use of open containers to store or dispense inks and/or surface coatings 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 or coating to a substrate.

To ensure that these work practices are not in use, the facility will conduct weekly inspections for the presence of any open containers as described in the prohibitions above and maintain a log book of these inspections. Any such open containers shall be closed immediately. The log book should include the following information at a minimum:

- date and time of inspection
- items or areas observed
- corrective measures taken, if

necessary.

Monitoring Frequency: WEEKLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

**Condition 1-8: Compliance Certification**

**Effective between the dates of 07/16/2002 and 03/11/2006**



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**Applicable Federal Requirement: 40CFR 63.820(a)(2), Subpart KK**

**Replaces Condition(s) 38**

**Item 1-8.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 1-8.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each new or existing facility at which publication rotogravure, product or packaging rotogravure, or wide web flexographic printing presses are operated for which the owner or operator chooses to commit to, and meets, the criteria of paragraphs §63.820 (a)(2)(i) and (ii) for purposes of establishing the facility to be an area source with respect to this subpart:

(i) Use less than 10 tons per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and

(ii) Use less than 25 tons per each rolling 12-month period of any combination of HAPs at the facility, including materials used for source categories or purposes other than printing and publishing.

Facilities meeting the above description are required to meet the provisions of recordkeeping and reporting as described in §63.829(d) and §63.830(b)(1).

Reference Test Method: EPA approved

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

**Condition 39: Compliance Certification**

**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 40CFR 63.829(d), Subpart KK**

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**Item 39.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 39.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall maintain records of all required measurements and calculations needed to demonstrate that the usage of HAPs is less than 10 tons per each rolling 12-month period for each HAP at the facility or less than 25 tons per each rolling 12-month period of any combination of HAPs at the facility. This calculation may 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.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

**Condition 1-9: Accidental release provisions.**

**Effective between the dates of 07/16/2002 and 03/11/2006**

**Applicable Federal Requirement: 40CFR 68.**

**Item 1-9.1:**

If a chemical is listed in Table 1 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit (if not previously submitted) one of the following if such quantities are present at the time of permit issuance:
  - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
  - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, NY 10007-1866  
ATTN: Accidental Release Program contact

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

**Condition 41: Emission Point Definition By Emission Unit**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

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

**Item 41.1(From Mod 0):**

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

Emission Unit:	0-2USTS		
Emission Point:	00027		
Height (ft.):	22	Diameter (in.):	2
			Building: PLANT
Emission Point:	00028		
Height (ft.):	22	Diameter (in.):	2
			Building: PLANT

**Item 41.2(From Mod 0):**

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

Emission Unit:	1-PRINT		
Emission Point:	00020		
Height (ft.):	44	Diameter (in.):	35
			Building: PLANT
Emission Point:	00021		
Height (ft.):	44	Diameter (in.):	35
			Building: PLANT
Emission Point:	00036		
Height (ft.):	44	Diameter (in.):	35
NYTMN (km.):	4509.6	NYTME (km.):	611.43
			Building: PLANT
Emission Point:	00037		
Height (ft.):	0	Diameter (in.):	18
NYTMN (km.):	4509.6	NYTME (km.):	611.43
			Building: PLANT

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**Condition 42: Process Definition By Emission Unit**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

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

**Item 42.1(From Mod 0):**

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

Emission Unit: 0-2USTS

Process: P02

Source Classification Code: 4-05-007-01

Process Description:

THE EMISSION UNIT (2-USTS)ADDRESSES THE  
INSIGNIFICANT EMISSIONS GENERATED FROM THE  
LOADING, AND STORAGE OF SOLVENTS IN TWO (2)  
UNDERGROUND STORAGE TANKS.

Emission Source/Control: 0UST1 - Process

Design Capacity: 3,000 gallons

Emission Source/Control: 0UST2 - Process

Design Capacity: 3,000 gallons

**Item 42.2(From Mod 0):**

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

Emission Unit: 1-PRINT

Process: P01

Source Classification Code: 4-05-003-11

Process Description:

SEVEN FLEXOGRAPHIC PRINTING LINES WITH  
ATTACHED THERMAL OXIDIZERS ARE ASSOCIATED  
WITH A SINGLE PROCESS; THE PRODUCTION OF  
FLEXIBLE LABELS. THIS EMISSION UNIT  
(1PRINT) ADDRESSES THE REGULATED AIR  
POLLUTANTS GENERATED FROM THE SEVEN  
PRODUCTION LINES (FLE XOGRAPHIC PRINTING,  
COATING) AND VIDEOJET PRINTING OPERATION.

Emission Source/Control: OXID1 - Control

Control Type: CATALYTIC AFTERBURNER WITH HEAT  
EXCHANGER

Emission Source/Control: OXID2 - Control

Control Type: CATALYTIC AFTERBURNER WITH HEAT  
EXCHANGER

Emission Source/Control: OXID3 - Control

Control Type: CATALYTIC AFTERBURNER WITH HEAT

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**EXCHANGER**

Emission Source/Control: PRES1 - Process

Emission Source/Control: PRES2 - Process

Emission Source/Control: PRES3 - Process

Emission Source/Control: PRES4 - Process

Emission Source/Control: PRES5 - Process

Emission Source/Control: PRES6 - Process

Emission Source/Control: PRES7 - Process

Emission Source/Control: VIDEO - Process

**Condition 43: VOL storage tanks less than 10000 gallons  
Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(v)**

**Item 43.1:**

This Condition applies to Emission Unit: 0-2USTS Emission Point: 00027  
Process: P02

**Item 43.2:**

Volatile organic liquid tanks with a capacity of less than 10,000 gallons must be equipped with a conservation vent.

**Condition 44: VOL storage tanks less than 10000 gallons  
Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(v)**

**Item 44.1:**

This Condition applies to Emission Unit: 0-2USTS Emission Point: 00028  
Process: P02

**Item 44.2:**

Volatile organic liquid tanks with a capacity of less than 10,000 gallons must be equipped with a conservation vent.

**Condition 1-10: Compliance Certification  
Effective between the dates of 07/16/2002 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 231-2.6**

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**Item 1-10.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-10.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Records for demonstration of compliance with the VOC emission limit shall be maintained on site for five years.

Any exceedance of the allowable annual VOC emission limitation must be reported in writing to the DEC Regional office within 10 working days of the exceedance.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: VOC's

Upper Permit Limit: 326.09 tons per year

Reference Test Method: EPA approved

Monitoring Frequency: ANNUALLY

Averaging Method: ARITHMETIC MEAN

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 04/10/2003 for the period 07/16/2002 through 03/11/2003

**Condition 46: Facilities subject to Part 234 remain subject even if emissions go below applicability threshold  
Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.1(g)**

**Item 46.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 46.2:**

Any printing process that is subject to the provisions of 6NYCRR Part 234 will remain subject to these provisions even if the emissions of volatile organic compounds from the facility later fall below the applicability criteria.

**Condition 47: flexographic printing control requirement  
Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.3(a)(3)(iii)**

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**Item 47.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 47.2:**

Where a flexographic printing process is employed the capture system and air cleaning device must provide for an overall reduction in volatile organic compound emissions of at least 60.0 percent.

**Condition 49: Compliance Certification**

**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.3(a)(3)(iii)**

**Item 49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 49.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

ENSURE PROPER CAPTURE OF VOC EMISSIONS THROUGH MONTHLY INSPECTIONS AND MAINTENANCE (WHERE REQUIRED) OF CAPTURE EQUIPMENT, TO ENSURE 77-80% OVERALL CONTROL OF VOC EMISSIONS.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

**Condition 1-11: control requirement**

**Effective between the dates of 07/16/2002 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.3(e)**

**Replaces Condition(s) 50**

**Item 1-11.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 1-11.2:**



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No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 10 percent or greater for any consecutive six-minute period from any emission source subject to 6 NYCRR Part 234.

**Condition 52: control requirement**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.4(b)(1)**

**Item 52.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 52.2:**

The owner or operator must follow notification requirements, protocol requirements and test procedures of 6NYCRR Part 202 for testing and monitoring. Depending upon the conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 must be used when measuring volatile organic compound (VOC) concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

(a) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography,

(b) Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon,

(c) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

(d) Methods not listed above must be approved in advance by the commissioner's representative and the United States Environmental Protection Agency.

**Condition 53: control requirement**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.4(b)(2)**

**Item 53.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 53.2:**

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings and printing inks are presented in Appendix A, methods 24 and 24A respectively, of 40 CFR 60. Alternate analytical methods for surface coating and printing ink analysis must be approved by the commissioner and the USEPA. Instead of an ink solvent/volatile analysis, the commissioner may accept certification from the ink manufacturer of the composition of the ink solvent/volatiles, if supported by actual batch records.

**Condition 54: sampling**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

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Facility DEC ID: 1282000185



**Applicable Federal Requirement: 6NYCRR 234.4(b)(4)**

**Item 54.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 54.2:**

The results of any analysis or other procedure used for establishing compliance must be provided to the commissioner's representative. Representatives of the department shall be permitted, during reasonable business hours, to obtain ink and/or fountain solution samples for the purpose of determining compliance with 6NYCRR Part 234.

**Condition 55: prohibition of sale or specification**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.5(a)**

**Item 55.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 55.2:**

No person shall sell, specify, or require for use, the application of a coating or ink on a substrate at a facility with a printing process subject to the volatile organic compound control requirements of 6 NYCRR Part 234 if such use is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which any coating or ink is to be applied to any substrate at any affected facility. This prohibition shall not apply to the following:

(1) coatings and/or inks utilized at printing processes where control equipment has been installed to achieve compliance;

(2) coatings and/or inks utilized at printing processes that have been granted variances for reasons of technological and economic feasibility.

**Condition 56: Part 63 General Provisions requirements**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 40CFR 63.823, Subpart KK**

**Item 56.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 56.2:**

Table 1 to 40CFR63 Subpart KK provides cross references to the 40CFR Part 63 Subpart A, General Provisions, indicating the applicability of the General Provisions requirements to Subpart KK.

**Condition 57: Deadlines for Initial Notification report**  
**Effective between the dates of 03/12/2001 and 03/11/2006**



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**Applicable Federal Requirement: 40CFR 63.830(b)(1), Subpart KK**

**Item 57.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 57.2:**

Initial Notifications for existing sources shall be submitted no later than May 30, 1998.  
Initial Notifications for new and reconstructed sources shall be submitted as required by 40CFR63.9(b).  
For the purposes of 40CFR63 Subpart KK, a Title V permit may be used in lieu of the Initial Notification required under Section 63.9(b), provided the same information is contained in the permit application as required by Section 63.9(b). Permit applications shall be submitted by the same due dates as those specified for the Initial Notification.

**Condition 58: Compliance Certification**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.4(c)(4)**

**Item 58.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT    Emission Point: 00020  
Process: P01                Emission Source: OXID1

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

**Item 58.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:  
ENSURE PROPER DESTRUCTION OF VOC  
EMISSIONS BY MAINTAINING A MINIMUM  
OPERATING TEMPERATURE OF 550 DEGREE  
FARENFEIT IN THE CATALYTIC OXIDIZER TO  
PROVIDE AN OVERALL CONTROL OF VOC  
EMISSIONS OF 77%.

Parameter Monitored: TEMPERATURE  
Lower Permit Limit: 550 degrees Fahrenheit  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.



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The initial report is due 4/30/2001.

Subsequent reports are due every 3 calendar month(s).

**Condition 59: Compliance Certification**

**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable Federal Requirement: 6NYCRR 234.4(c)(4)**

**Item 59.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT    Emission Point: 00021

Process: P01                Emission Source: OXID2

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 59.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

ENSURE PROPER DESTRUCTION OF VOC  
EMISSIONS BY MAINTAINING A MINIMUM  
OPERATING TEMPERATURE OF 550 DEGREE  
FARENHEIT IN THE CATALYTIC OXIDIZER TO  
PROVIDE AN OVERALL CONTROL OF VOC  
EMISSIONS OF 77%.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2001.

Subsequent reports are due every 3 calendar month(s).



**STATE ONLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable and are not subject to annual compliance certification requirements for Title V permits.**

**Condition 1-12: Contaminant List**

**Effective between the dates of 07/16/2002 and 03/11/2006**

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

**Item 1-12.1:**

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



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Name: HAP

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Name: VOC

**Condition 1-13: Unavoidable noncompliance and violations**

**Effective between the dates of 07/16/2002 and 03/11/2006**

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

**Item 1-13.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air



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quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 62: Air pollution prohibited**  
**Effective between the dates of 03/12/2001 and 03/11/2006**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 62.1:**

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.