

New York State Department of Environmental Conservation
Facility DEC ID: 2610200127



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
2-6102-00127/00006
Effective Date: 08/30/2001 Expiration Date: No expiration date

Permit Issued To: EXCELLO FILM PAK INC
166 25TH STREET
BROOKLYN, NY 11232-1409

Contact: ROBERT EHRMAN
EXCELLO FILM PAK, INC.
166 25 STREET
BROOKLYN, NY 11232
(718) 499-0300

Facility: EXCELLO FILM PAK-166 25TH ST
166 25TH STREET
BROOKLYN, NY 11232

Description:

NATURE OF THE BUSINESS CONDUCTED AT THE FACILITY

Flexographic printing subject 6 NYCRR Part 234.
SIC:2759

TYPE OF EQUIPMENT

Facility has two flexographic printing presses: one 4 color and one 6 color. Facility applied for a permit to install catalytic incinerator in order to be in compliance with Part 234 .

AIR PERMIT APPLICABILITY AND CAPPING

Facility is capping out of 6 NYCRR Part 201-6 and has applied for a State facility permit. Facility's emissions of VOC shall be kept below 25 tons per year on a monthly rolling basis. Facility has to track ink and solvent usage and calculate VOC on monthly basis to demonstrate compliance with the emission cap.

CONSENT ORDER

R2-0174-97-09

Facility must install catalytic incinerator in accordance with the Schedule A of Consent order.

FINAL

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FINAL

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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: JOHN F CRYAN
 DIVISION OF ENVIRONMENTAL PERMITS
 ONE HUNTERS POINT PLAZA, 47-40 21ST STREET
 LONG ISLAND CITY, NY 11101-5407

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

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal-REGION 2

HEADQUARTERS



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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

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

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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 2 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 2 Headquarters
Division of Environmental Permits
1 Hunters Point Plaza, 4740 21st Street
Long Island City, NY 11101-5407
(718) 482-4997



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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: EXCELLO FILM PAK INC
166 25TH STREET
BROOKLYN, NY 11232-1409

Facility: EXCELLO FILM PAK-166 25TH ST
166 25TH STREET
BROOKLYN, NY 11232

Authorized Activity By Standard Industrial Classification Code:
2759 - COMMERCIAL PRINTING, NEC



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 19 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 3 6NYCRR 200.7: Maintenance of equipment
- 7 6NYCRR 201-1.7: Recycling and Salvage
- 8 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the Air
- 10 6NYCRR 201-3.2(a): Proof of Eligibility
- 11 6NYCRR 201-3.3(a): Proof of Eligibility
- 15 6NYCRR 202-1.1: Required emissions tests
- 18 6NYCRR 211.3: Visible emissions limited.
- 1 6NYCRR 200.5: Sealing
- 2 6NYCRR 200.6: Acceptable ambient air quality
- 4 6NYCRR 201-1.2: Unpermitted Emission Sources
- 5 6NYCRR 201-1.4: Unavoidable Noncompliance and Violations
- 6 6NYCRR 201-1.5: Emergency Defense
- 9 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 12 6NYCRR 201-7.2: Facility Permissible Emissions
- *13 6NYCRR 201-7.2: Compliance Demonstration
- 14 6NYCRR 201-7.2(e): Compliance Demonstration
- 16 6NYCRR 202-1.2: Notification
- 17 6NYCRR 202-1.5: Prohibitions
- 20 6NYCRR 234.3: Compliance Plan
- 21 6NYCRR 234.3(a): Compliance Demonstration
- 22 6NYCRR 234.4: Facility Permissible Emissions
- *23 6NYCRR 234.4: Compliance Demonstration
- 24 6NYCRR 234.4(b)(3): Compliance Demonstration
- 25 6NYCRR 234.4(c)(1): Compliance Demonstration
- 26 6NYCRR 234.4(c)(2): Compliance Demonstration
- 27 6NYCRR 234.6: Compliance Demonstration

Emission Unit Level

EU=A-00001

- 28 6NYCRR 234.1(g): Facilities subject to Part 234 remain subject even if emissions go below applicability threshold
- 29 6NYCRR 234.3(a)(3)(iii): Compliance Demonstration
- 30 6NYCRR 234.3(e): Compliance Demonstration
- 31 6NYCRR 234.3(f)(3): Compliance Demonstration
- 32 6NYCRR 234.4(a): control requirement-other than VOC/solvent recovery

EU=A-00001,Proc=001

- 33 6NYCRR 234.3(a)(3)(iv): control requirements
- 34 6NYCRR 234.4(b)(1): control requirement

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- 35 6NYCRR 234.4(b)(2): control requirement
- 36 6NYCRR 234.4(b)(4): sampling
- 37 6NYCRR 234.4(c)(2): temperature rise

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 38 6NYCRR 201-5: General Provisions
- 39 6NYCRR 201-5: Permit Exclusion Provisions
- 40 6NYCRR 201-5: Emission Unit Definition
- 41 6NYCRR 201-5.3(b): Contaminant List
- 42 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 43 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 44 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping. Permit Effective Date: 08/30/2001
Permit Expiration Date: No expiration date.

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FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

Condition 19: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 19.1:

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.

Condition 3: Maintenance of equipment
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 3.1:

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

Condition 7: Recycling and Salvage
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 7.1:

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.

Condition 8: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 8.1:

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

Condition 10: Proof of Eligibility
Effective between the dates of 08/30/2001 and Permit Expiration Date

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Applicable Federal Requirement: 6NYCRR 201-3.2(a)

Item 10.1:

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

Condition 11: Proof of Eligibility

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-3.3(a)

Item 11.1:

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.

Condition 15: Required emissions tests

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 15.1:

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.

Condition 18:

Visible emissions limited.

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 18.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-

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minute period per hour of not more than 57 percent opacity.

Condition 1: Sealing
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

- (a) 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 labelling 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.
- (b) 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.
- (c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

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

Condition 4: Unpermitted Emission Sources
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 4.1:

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.

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(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.

Condition 5: Unavoidable Noncompliance and Violations
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal/6NYCRR 201-1.4

Item 5.1:

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 or certificate issued for the corresponding air contamination source. 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.
- (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 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.



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Condition 6: Emergency Defense
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 6.1:

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 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.

Condition 9: Public Access to Recordkeeping
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.10(a)

Item 9.1:

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Condition 12: Facility Permissible Emissions



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Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 12.1:

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

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

CAS No: 0NY998-00-0 PTE: 49,800 pounds per year
Name: VOC

Condition 13: Compliance Demonstration

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility shall not emit in excess of 24.9 tons of volatile organic compounds per rolling 12 month period as determined by summing monthly VOC emissions during any consecutive twelve month period.

The owner shall maintain written records of the VOC emitted monthly as well as production, purchase and inventory records used to calculate these VOC emissions. Records must include VOC's in tons per year for the previous consecutive twelve month.

Parameter Monitored: VOC

Upper Permit Limit: 24.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

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Initial Report Due: 09/28/2002 for the period 08/30/2001 through 08/29/2002

Condition 14:

Compliance Demonstration

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.2(e)

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

On an annual basis beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated within the limits imposed by the emissions cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold values that would require compliance with an applicable requirement.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 09/28/2002 for the period 08/30/2001 through 08/29/2002

CondNotification

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.2

Item 16.1:

A person who is required by the commissioner to submit a stack test report shall notify the commissioner, in writing, not less than 30 days prior to the test, of the time and date of the test. Such notification shall also include the acceptable procedures to be used to stack test including sampling and analytical procedures. Such person shall allow the commissioner, or his representative, free access to observe stack testing being conducted by such person.

Condition 17: Prohibitions

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.5

Item 17.1:



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No person shall conceal an emission by the use of air or other gaseous diluents to achieve compliance with an emission standard which is based on the concentration of a contaminant in the gases emitted through a stack.

Condition 20: Compliance Plan
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.3

Item 20.1:

Compliance will be achieved according to the following schedule for the Facility:

Consent Order: R201749709
Progress Report Begin Date: 09/28/2000

Item 20.2:

Remedial Measure:

Schedule Date:

IMMEDIATELY COMMENCE INSTALLATION OF CATALYTIC

INCINERATOR

Item 20.3:

Remedial Measure:

Schedule Date:

SUBMIT DEPARTMENT STACK TEST PROTOCOL FOR APPROVAL

Item 20.4:

Remedial Measure:

Schedule Date:

PERFORM STACK TEST AS PER APPROVED PROTOCOL

Item 20.5:

Remedial Measure:

Schedule Date:

SUBMIT DEPARTMENT STACK TEST REPORT FOR APPROVAL

Item 20.6:

Remedial Measure:

Schedule Date: 03/28/2001

COMPLETE INSTALLATION OF CATALYTIC INCINERATOR

Condition 21: Compliance Demonstration
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.3(a)

Item 21.1:

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The Compliance Demonstration activity will be performed for the Facility.

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Flexographic printing process subject to Part 234 shall not operate unless the process meets one of the following control strategies:

(1) the volatile fraction of the ink, as it is applied to the substrate, contains 25.0 percent by volume or less of volatile organic compounds and 75.0 percent by volume or more of nonreactive volatiles.

or

(2) ink as it is applied to the substrate, less nonreactive volatiles, contains 60.0 percent by volume or more nonvolatile material.

or

(3) the capture system and air cleaning device must provide for an overall reduction in volatile organic compound emissions of at least 60.0 percent.

Facility proposes to comply with option 3. As such facility will be installing catalytic incinerator in accordance with permit schedule under for NYCRR Part 234.4.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 22: Facility Permissible Emissions

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4

Item 22.1:

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

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

CAS No: 0NY998-00-0

PTE: 49,800 pounds per year

Name: VOC



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Condition 23: Compliance Demonstration

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Complete installation of the catalytic incinerator within 6 months of the Respondent's signing the consent order (by 3/28/01).

Within 45 days of completion of construction of incinerator, but no later than 225 days after respondent's signing consent order, submit to DEC Region 2 Air Program 2 copies of the stack test protocol for approval at least 90 days prior to emission testing. The testing procedures must be in accordance with 202-1.2, and 202-1.3.

Within 45 days of DEC's approval of stack test protocol perform stack testing of incinerator in accordance with approved protocol. Such test must be witnessed by DEC staff.

Within 45 days after the completion of the tests the owner or operator of the facility must submit the test report to the department for approval.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 24: Compliance Demonstration

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable F6NYCRR 234.4(b)(3)

Item 24.1:

New York State Department of Environmental Conservation

Permit ID: 2-6102-00127/00006

Facility DEC ID: 2610200127



The Compliance Demonstration activity will be performed for the Facility.

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

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks, VOC and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the Department's representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the Commissioner's representative in a format acceptable to him or her. Records must be maintained at the facility for a period of five years.

The facility shall maintain the following records for each ink, cleaning solvent, and other VOC used in the printing process, on a monthly basis:

1. The brand and product name or code for the material.
2. The quantity of material used during the calendar month.
3. The VOC content of the material.

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the monthly log are to be kept on site.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 25: Compliance Demonstration
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(c)(1)

Item 25.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 2-6102-00127/00006

Facility DEC ID: 2610200127



CAS No: 0NY998-00-0 VOC

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The inlet and outlet catalytic temperature of the catalytic incinerator used to comply with 6NYCRR Part 234 shall be monitored continuously. The temperature of catalyst inlet bed temperature shall not fall below the minimum temperature at which compliance with Part 234 be demonstrated during the performance test.

The continuous temperature monitor shall be installed, periodically calibrated according to manufactures specifications, and shall be operated at all times that the incinerator is operating.

The facility shall keep records on site for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 26:

Compliance Demonstration

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(c)(2)

Item 26.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The temperature rise across the catalytic incinerator bed shall be monitored continuously in order to demonstrate compliance with part 234. The temperature change across the bed shall not fall below the minimum temperature change at which compliance with part 234 be demonstrated during the performance test.

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Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 27: Compliance Demonstration

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.6

Item 27.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 27.2:

Compliance Demonstration 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 daily 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

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minimum:

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

necessary.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 28: Facilities subject to Part 234 remain subject even if emissions go below applicability threshold Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.1(g)

Item 28.1:

This Condition applies to Emission Unit: A-00001

Item 28.2:

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 29:

Compliance Demonstration

Effective between the dates of 08/30/2001 and Permit Expiration Date

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

Item 29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Where a flexographic printing process is employed, the capture system and the air cleaning device must provide



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for an overall reduction in volatile organic compound emissions of at least 60.0 percent.

Parameter Monitored: VOC

Lower Permit Limit: 60.0 percent reduction by weight

Reference Test Method: Method 25 (40CFR60)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 30: Compliance Demonstration
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 30.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Item 30.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions 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 6NYCRR Part 234.

Parameter Monitored: OPACITY

Upper Permit Limit: 10.0 percent

Monitoring Frequency: CONTINUOUS

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 31: Compliance Demonstration
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.3(f)(3)

Item 31.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

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Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 31.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The commissioner may allow sources which use natural gas fired afterburners as control devices for processes subject to Part 234, to shut down these natural gas fired afterburners from November 1st through March 31st for the purposes of natural gas conservation, provided that the commissioner has determined that this action will not jeopardize air quality. Such information shall be submitted with the application for a permit to construct, a certificate to operate, or renewal of a certificate to operate for an existing source under the provisions of Part 201.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 32: control requirement-other than VOC/solvent recovery
Effective between the dates of 08/30/2001 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 234.4(a)

Item 32.1:

This Condition applies to Emission Unit: A-00001

Item 32.2:

When a printing process utilizes control equipment to comply with the provisions 6NYCRR Part 234, test methods acceptable to the Department must be used when demonstrating the overall removal efficiency.

For control equipment other than VOC/solvent recovery, this demonstration must include provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of these air contaminants by control equipment prior to their release to the atmosphere.

**Condition 33: control requirements
Effective between the dates of 08/30/2001 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 234.3(a)(3)(iv)



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Item 33.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 33.2:

The overall removal efficiency is determined by testing the capture efficiency and the removal efficiency of the control equipment, utilizing test methods acceptable to the commissioner.

Condition 34: control requirement

Effective between the dates of 08/30/2001 and Permit Expiration Date

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

Item 34.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 34.2:

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 35: control requirement

Effective between the dates of 08/30/2001 and Permit Expiration Date

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

Item 35.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 35.2:

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



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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 36: sampling
Effective between the dates of 08/30/2001 and Permit Expiration Date

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

Item 36.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 36.2:

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 37: temperature rise
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable F6NYCRR 234.4(c)(2)

Item 37.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 37.2:

A continuous monitor which measures the temperature rise across the catalytic incinerator bed shall be installed, periodically calibrated and operated at all times the catalytic incinerator is operating.

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STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

Condition 38:

General Provisions

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 38.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 38.2:

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.

Item 38.3:

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

Condition 39: Permit Exclusion Provisions

Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 39.1:

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 currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant 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 by the Department and the receipt thereof by the Applicant does not supercede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements



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contained in such order or modification thereof unless specifically intended by this permit.

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 the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not addressed in this permit.

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 the right of the Department to pursue any claims for natural resource damages against the Applicant.

Condition 40: Emission Unit Definition
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 40.1:

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

Emission Unit: A-00001

Emission Unit Description:

ONE 4 COLOR AND ONE 6 COLOR FLEXOGRAPHIC
PRESS EACH EXHAUSTING TO INDIVIDUAL DRYERS.
BOTH DRYERS WILL BE EXHAUSTED TO A
CATALYTIC INCINERATOR.

Building(s): 01

Condition 41: Contaminant List
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5.3(b)

Item 41.1:

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

CAS No: 0NY998-00-0

Name: VOC

Condition 42: Air pollution prohibited
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

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Item 42.1:

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.

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

Condition 43: Emission Point Definition By Emission Unit
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 43.1:

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

EmissionA-00001

Emission Point: 00001

Height (ft.): 22

Length (in.): Width (in.): 15

Condition 44: Process Definition By Emission Unit
Effective between the dates of 08/30/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 44.1:

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

Emission Unit: A-00001

Process: 001

Source Classification Code: 4-05-004-11

Process Description:

FLEXOGRAPHIC PRINTING OPERATIONS. INKS ARE APPLIED TO FILM SUBSTRATES AND DRIED IN HOT AIR OVENS. VOC EMISSIONS FROM THE PROCESS WILL BE DESTROYED IN THE CATALYTIC INCINERATOR DURING THE PERIOD APRIL 1 THROUGH OCTOBER 31.

Emission S00003 - Control

Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: 00001 - Process

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Emission Source/Control: 00002 - Process

Item 44.2:

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

Emission Unit: A-00001
Process: 002 Source Classification Code: 4-05-004-14
Process Description: PRESS CLEAN-UP WITH I-PROPANOL

Emission S00001 - Process

Emission Source/Control: 00002 - Process

Item 44.3:

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

Emission Unit: A-00001
Process: 003 Source Classification Code: 4-05-004-01
Process Description:

THE SAME TWO FLEXOGRAPHIC PRINTING PRESSES
USED IN EU A00001 WILL BE USED BETWEEN
NOV. 1 AND MARCH 31 YEARLY UNDER A
SEASONAL VARIANCE WITHOUT THE USE OF THE
CATALYTIC FUME INCINERATOR.

Emission Source/Control: 00001 - Process

Emission S00002 - Process