

New York State Department of Environmental Conservation
Facility DEC ID: 2610500149



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 2-6105-00149/00006
Effective Date: 03/02/2006 Expiration Date: 03/01/2011

Permit Issued To: ULTRA FLEX PACKAGING CORP
975 ESSEX ST
BROOKLYN, NY 11208-5419

Contact: RONALD BENNETT
ULTRA FLEX PACKAGING CORPORATION
975 ESSEX ST
BROOKLYN, NY 11208-5419
(718) 272-9100

Facility: ULTRA FLEX PKG CORP-975 ESSEX ST
975 ESSEX STREET
BROOKLYN, NY 11208-5419

Contact: RONALD BENNETT
ULTRA FLEX PACKAGING CORPORATION
975 ESSEX ST
BROOKLYN, NY 11208-5419
(718) 272-9100

Description:

PERMIT DESCRIPTION
Ultra Flex Packaging Corporation
DEC ID # 2-6105-00149/00006 (Ren 1)

This is a Title V air permit renewal application for Ultra Flex Packaging Corp. Currently, the facility has a Title V permit that was issued on 12/5/2000 and is due to expire on 12/4/2005. Ultra Flex Packaging Corporation is located at 975 Essex Street in Brooklyn, New York. Ultra Flex operates three 10-color flexographic printing presses and one laminator ducted to the Regenerative Thermal Oxidizer (RTO) to produce flexible packaging materials. The facility creates VOC emissions that are currently processed through a natural gas fired regenerative thermal oxidizer with a destruction efficiency of 95% before emitting to the environment. The facility is subject to the requirements of 6 NYCRR Parts 226, 227, 228, 234 and 40 CFR 63 Subparts A and KK. The facility complies with all federal and state requirements by maintaining a permanent total enclosure and operates an RTO (Regenerative Thermal Oxidizer) with minimum inlet temperature at 1500 degrees Fahrenheit, and with a minimum destruction efficiency of 95%. This facility is a minor source and not a major source of HAPs. However, this facility is a major source of VOC. The Title V renewal contains a complete listing of the applicable federal, state and compliance monitoring requirements for the facility, its emission unit and emission point.

New York State Department of Environmental Conservation
Facility DEC ID: 2610500149



Ultra Flex Packaging Corporation has been under an internal pollution prevention and equipment upgrade program for the past few years to reduce overall solvent use and contaminant emissions. Other such measures have included the first Fischer & Krecke state-of-the-art printing press (Emission Source FLX05) and the new regenerative thermal oxidizer (RTO) control technology to improve the VOC destruction efficiency and accommodate subsequent new printing presses. Two new 10-color (each) state-of-the-art Fischer & Krecke flexographic printing presses (Emission Sources FLX06 & FLX07) replaced four MAF 140 flexographic printing presses (Emission Sources FLXP1, FLXP2, FLXP3 & FLXP4) in 2003, of which two were 6-color and the other two were 8-color.

This Title V renewal consists of the Title V permit that was issued on 12/5/2000, and incorporating the following two Air State Facility Permits that were issued to Ultra Flex Packaging Corporation:

(1) ASF, DEC ID # 2-6105-00149/00011 issued on 7/15/2002 to replace an old catalytic oxidizer (Thermo Electron 21000) with a new Regenerative Thermal Oxidizer (RTO). The regenerative thermal oxidizer (RTO) is more efficient than the old previous catalytic oxidizer. The destruction efficiency of the RTO is about 95%. At the same time the facility began operation of a new Fischer & Krecke flexographic printing press (FLXP5) that was incorporated into the first Title V permit, but not operated until 4/1/2002, and

(2) ASF, DEC ID # 2-6105-00149/00012 issued on 5/14/2003 to construct two (2) new state-of-the-art Fischer & Krecke flexographic printing presses (FLXP6 & FLXP7), which are 10-color each, and to remove four (4) MAF 140 flexographic printing presses (two are 6-color and the other two are 8-color).

This facility has eliminated four (4) MAF 140 flexographic printing presses (FLXP1, FLXP2, FLXP3 & FLXP4), of which two were 6-color and the other two were 8-color printing presses, and replaced them with two (2) new state-of-the-art Fischer & Krecke flexographic printing presses (FLXP6 & FLXP7), which are 10-color each and are identical to the first printing press (FLXP5). The following four (4) flexographic printing presses (all vented to the oxidizer) were permanently removed from the facility in a phased approach:

FLXP1 MAF 140, 6-color press (originally installed in 1989; was removed on 2/28/03 with second Fischer & Krecke installation - FLXP6 (10-color printing press),

FLXP2 MAF140, 6-color press (originally installed in 1989; was removed on 2/28/03 with second Fischer & Krecke installation - FLXP6 (10-color printing press),

FLXP3 MAF140, 8-color press (originally installed in 1992; was removed on 2/28/2003 as well.

FLXP4 MAF140, 8-color press (originally installed in 1994; was removed on 2/28/03 with second Fischer & Krecke installation FLXP6 (10-color printing press).

FLXP5 is a 10-color existing permitted (first) Fischer & Krecke flexographic printing press, was installed on 4/1/2002. This FLXP5 printing press is designated as PRESS # 1 at the Ultra Flex facility.

FLXP6 is a 10-color existing permitted (second) Fischer & Krecke flexographic printing press, was installed on 2/28/2003. This FLXP6 printing press is designated as PRESS # 2 at the Ultra Flex facility.



New York State Department of Environmental Conservation
Facility DEC ID: 2610500149

FLXP7 is a 10-color permitted (third) Fischer & Krecke flexographic printing press. This FLXP7 printing press will be designated as PRESS # 3 at the Ultra Flex facility, which is a proposed future installation.

The facility's potential emissions for volatile organic compounds exceed the major source threshold of 25 tons in non-attainment areas and ozone transport regions. As a result of the NYCRR Part 231-2 (New Source Review in non-attainment areas and ozone transport regions) applicability evaluation for the RTO, there is no increase in the Maximum Annual Potential (MAP) of the emission unit, nor for the facility. As a result of the 6 NYCRR Part 231-2 (New Source Review) in non-attainment areas and ozone transport regions applicability evaluation for the replacement of the printing presses, there is an increase of 3.8 tons of VOC in the Maximum Annual Potential (MAP) of the facility. Two new state-of-the-art Fischer & Krecke flexographic printing presses (Emission Sources FLX06 & FLX07) replaced four MAF 140 flexographic printing presses (Emission Sources FLXP1, FLXP2, FLXP3 & FLXP4). Therefore, as a result of the replacement of the printing presses and the VOC emissions increase, the facility is not subject to Part 231-2 (New Source Review). The new regenerative thermal oxidizer and the resulting emissions from the new flexographic printing press configuration at this facility will not provide an increase beyond the facility's currently permitted VOC emissions of 91 TPY. Therefore, this facility is not subject to Part 231-2 (New Source Review), and there are no changes to any lamination-related processes.

The Title V permit contains a complete listing of the applicable federal, state and compliance monitoring requirements for the facility, its emission units, emission points, and its processes. Ultra Flex Corp. is subject to the following regulations:

1. 6 NYCRR 226 - General requirements for solvent storage of 20% loss, five year record of solvent consumption, equipment specifications for cold cleaning, and operating requirements for cold cleaning-drained in 15 seconds.
2. 6 NYCRR 227-1.3(a) - Smoke emission limitations of 20% for the three compressor engine (stationary combustion installation) as per 6 NYCRR 227-1.3(a).
3. A. 6 NYCRR 228.3 - VOC incinerator - 80% overall removal efficiency, solids as applied.
B. 6 NYCRR 228.5 - VOC recordkeeping at the facility, demonstration by directly measuring VOC/solvent recovery, demonstration of other than VOC solvent recovery, testing and monitoring of Methods 18, 25 & 25A, and temperature rise across catalytic incinerator bed monitoring.
C. 6 NYCRR 228.10 - Handling, storage and disposal of VOCs, open containers - cloth or paper disposal, open containers - spent or fresh VOC, Post 1/1/2004 Spray equipment clean-up, open containers - storage, dispense of coatings or inks, and open containers - store, dispose of coatings, VOCs, solvents.
4. A. 6 NYCRR 234.3 - Control requirements for the flexographic printing presses, opacity requirements.
B. 6 NYCRR 234.4(b) - Testing, monitoring, and recordkeeping of purchase, usage and/or production records of inks, VOC's and solvents.
C. 6 NYCRR 234.4 (c) - testing, monitoring and recordkeeping of the exhaust gas temperature, the



New York State Department of Environmental Conservation
Facility DEC ID: 2610500149

temperature rise across the bed, the continuous parametric monitoring for air cleaning.

- D. 6 NYCRR 234.6 - the handling, storage and disposal of volatile organic compounds (VOC).
- 5. 40 CFR 63-A.6(b)(2) - compliance dates for new and constructed sources.
- 6. 40 CFR 63-KK.820(a) - Printing and Publishing NESHAP - applicability.
- 7. 40 CFR 63-KK.825 - Printing and Publishing NESHAP with overall organic HAP.
- 8. 40 CFR 63-KK.826 - Compliance dates for an existing source.
- 9. 40 CFR 63-KK.827 - Printing and publishing NESHAP - performance test methods of an oxidizer, and procedure for determining capture efficiency.
- 10. 40 CFR 63-KK.828 - Monitoring requirements for oxidizers (not catalytic).
- 11. 40 CFR 63-KK.829 - Printing and Publishing NESHAP - Recordkeeping requirements.
- 12. 40 CFR 63-KK.830 - Printing and Publishing NESHAP - Recordkeeping requirements and notification of performance test.

The facility operates other sources which are considered exempt from permitting in accordance with 6 NYCRR 201-3.2(c), including ten small boilers (<10 MM BTU/hr) in the M Building; three internal combustion engines (<225 bhp) in the M Building, one storage tank with storage capacities <10,000 gal in the M Building, one exhaust system for paint operations (mixing, transfer, filling or sampling) in the M Building, one exhaust system for solvent operations (mixing, transfer, filling or sampling) in the M Building, one non-contact water cooling tower and water treatment system, and one non-vapor phase cleaning equipment using only organic solvents with an initial B.P. greater or equal to 300 degrees Fahrenheit.

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 ******

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 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

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.

Item 3.3:



New York State Department of Environmental Conservation
Facility DEC ID: 2610500149

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

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

Item 4.1:

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.

****** 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



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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975 ESSEX ST
BROOKLYN, NY 11208-5419

Facility: ULTRA FLEX PKG CORP-975 ESSEX ST
975 ESSEX STREET
BROOKLYN, NY 11208-5419

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

Permit Effective Date: 03/02/2006

Permit Expiration Date: 03/01/2011



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 24 6NYCRR 201-6.5(c)(3): Compliance Certification
- 25 6NYCRR 201-6.5(g): Non Applicable requirements
- 26 6NYCRR 202-2.5: Compliance Certification
- 27 6NYCRR 212.6(a): Compliance Certification
- 28 6NYCRR 212.6(a): Compliance Certification
- 29 6NYCRR 226.2(e): Compliance Certification
- 30 6NYCRR 228.1(a): Permit Requirements
- 31 6NYCRR 228.5(a): Compliance Certification
- 32 6NYCRR 234.4(b)(3): Compliance Certification
- 33 40CFR 63.820(a), Subpart KK: Applicability of 40CFR 63 Subpart KK
- 34 40CFR 63.825(e), Subpart KK: Compliance Certification
- 35 40CFR 63.829(b)(1), Subpart KK: Compliance Certification
- 36 40CFR 63.829(d), Subpart KK: Compliance Certification

Emission Unit Level

- 37 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 38 6NYCRR 201-6: Process Definition By Emission Unit

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



EU=U-00001

- 39 6NYCRR 228.3(b): Compliance Certification
- 40 6NYCRR 228.3(c): Solids as applied
- 41 6NYCRR 228.5(d): Department access to obtain samples.
- 42 6NYCRR 228.5(e)(1): Removal efficiency- directly measuring
VOC/solvent recovery
- 43 6NYCRR 228.5(e)(2): Demonstration of efficiency other than
VOC/solvent recovery
- 44 6NYCRR 228.5(f): Compliance Certification
- 45 6NYCRR 228.10: Compliance Certification
- 46 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 47 6NYCRR 234.3(a)(3)(iv): control requirements
- 48 6NYCRR 234.3(e): Compliance Certification
- 49 6NYCRR 234.4(a): control requirement-other than VOC/solvent recovery
- 50 6NYCRR 234.4(a)(2): Compliance Certification
- 51 6NYCRR 234.4(b)(1): control requirement
- 52 6NYCRR 234.6: Compliance Certification
- 53 40CFR 63.6(b)(2), Subpart A: Compliance dates for new and
reconstructed sources
- 54 40CFR 63.825(f)(3), Subpart KK: Monitoring of capture system and
control device parameters
- 55 40CFR 63.826(a), Subpart KK: Compliance date for an existing source
- 56 40CFR 63.827(d), Subpart KK: Compliance Certification
- 57 40CFR 63.828(a)(2)(ii), Subpart KK: Calibration of temperature
monitoring equipment
- 58 40CFR 63.828(a)(4)(i), Subpart KK: Compliance Certification
- 59 40CFR 63.828(a)(4)(ii), Subpart KK: Compliance Certification
- 60 40CFR 63.828(a)(5), Subpart KK: Continuous parameter monitoring for
capture efficiency
- 61 40CFR 63.828(a)(5)(iii), Subpart KK: Compliance Certification
- 62 40CFR 63.829(b), Subpart KK: Compliance Certification
- 63 40CFR 63.830(b)(2), Subpart KK: Notification of performance test
- 64 40CFR 63.830(b)(3), Subpart KK: Notification of compliance status

EU=U-00001,EP=00001

- 65 6NYCRR 228.5(g)(2): Compliance Certification
- 66 6NYCRR 234.4(c)(2): Compliance Certification
- 67 40CFR 63.825(b)(7), Subpart KK: Control requirements for product and
packaging rotogravure or wide-web flexographic presses
- 68 40CFR 63.825(d)(1), Subpart KK: Compliance Certification
- 69 40CFR 63.825(h)(3), Subpart KK: Compliance with capture and control
requirements
- 70 40CFR 63.827(e)(1), Subpart KK: Procedure for determining capture
efficiency



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

EU=U-00001,EP=00001,Proc=005,ES=LAMNT

- 71 6NYCRR 228.5(g)(2): Compliance Certification
- 72 6NYCRR 228.10(a): Compliance Certification
- 73 6NYCRR 228.10(b): Compliance Certification
- 74 6NYCRR 228.10(c): Compliance Certification
- 75 6NYCRR 228.10(d): Compliance Certification
- 76 6NYCRR 228.10(e): Compliance Certification

EU=U-00001,EP=00001,Proc=050,ES=FLX05

- 77 6NYCRR 234.4(b)(3): Compliance Certification
- 78 6NYCRR 234.6(a): Compliance Certification
- 79 6NYCRR 234.6(b): Compliance Certification
- 80 6NYCRR 234.6(c): Compliance Certification
- 81 6NYCRR 234.6(d): Compliance Certification
- 82 40CFR 63.829(b)(1), Subpart KK: Compliance Certification

EU=U-00001,EP=00001,Proc=060,ES=FLX06

- 83 6NYCRR 234.4(b)(3): Compliance Certification
- 84 6NYCRR 234.4(b)(4): Compliance Certification
- 85 6NYCRR 234.6(a): Compliance Certification
- 86 6NYCRR 234.6(b): Compliance Certification
- 87 6NYCRR 234.6(c): Compliance Certification
- 88 6NYCRR 234.6(d): Compliance Certification
- 89 40CFR 63.829(b)(1), Subpart KK: Compliance Certification

EU=U-00001,EP=00001,Proc=070,ES=FLX07

- 90 6NYCRR 234.4(b)(3): Compliance Certification
- 91 6NYCRR 234.6(a): Compliance Certification
- 92 6NYCRR 234.6(b): Compliance Certification
- 93 6NYCRR 234.6(c): Compliance Certification
- 94 6NYCRR 234.6(d): Compliance Certification
- 95 40CFR 63.829(b)(1), Subpart KK: Compliance Certification

EU=U-00001,EP=00001,Proc=OXD

- 96 6NYCRR 234.4(c)(4): Compliance Certification

EU=U-00001,EP=00001,Proc=OXD,ES=C0OXD

- 97 6NYCRR 234.3(a): Compliance Certification
- 98 6NYCRR 234.4(c)(1): Compliance Certification

EU=U-00002

- 99 6NYCRR 226.2: Compliance Certification
- 100 6NYCRR 226.2(a): Compliance Certification
- 101 6NYCRR 226.3(a): Compliance Certification
- 102 6NYCRR 226.4(a): Compliance Certification

EU=U-00003,EP=00003,Proc=006,ES=COMP1



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

103 6NYCRR 227-1.3(a)(1): Compliance Certification

104 6NYCRR 227-1.3(a)(2): Compliance Certification

EU=U-00004,EP=00004,Proc=007,ES=COMP2

105 6NYCRR 227-1.3(a)(1): Compliance Certification

106 6NYCRR 227-1.3(a)(2): Compliance Certification

EU=U-00005,EP=00005,Proc=008,ES=COMP3

107 6NYCRR 227-1.3(a)(1): Compliance Certification

108 6NYCRR 227-1.3(a)(2): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

109 ECL 19-0301: Contaminant List

110 6NYCRR 201-1.4: Unavoidable noncompliance and violations

111 6NYCRR 211.2: Air pollution prohibited



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: 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 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 B: 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

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



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 C: 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 D: 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 E: 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 F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission 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 G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR 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

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



order to maintain compliance with the conditions of this permit.

Item H: 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 I: 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 J: 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

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



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 K: 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



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

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

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

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

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 2: Fees

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 3.1:

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
- (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 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 4.1:

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



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

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 5: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

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 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 (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.

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



(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 above paragraphs (1) or (2) 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) and (2) 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 paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. 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. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



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 Quality Assurance (BQA) 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 PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 6: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



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.
- 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 Quality Assurance (BQA) 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:

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



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

The address for the RAPCE is as follows:

Hunters Point Plaza
47-40 21st Street
Long Island City, NY 11101-5407

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/2006.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
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. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:

(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 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:

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

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT
TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:

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

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:

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 the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:

No person shall 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 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 13.1:

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 this Subpart. 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 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 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. 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 this Subpart,



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

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: Standard Requirement - Provide Information
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 15.1:

The owner and/or operator 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. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart 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 emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

department. 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.

Condition 18: Off Permit Changes
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such 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 provision 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 as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 03/02/2006 and 03/01/2011

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Applicable Federal Requirement: 6NYCRR 211.3

Item 20.1:

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

Condition 21: Accidental release provisions.

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 68

Item 21.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, 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 at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 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:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 22: Recycling and Emissions Reduction

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

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



Condition 23: Emission Unit Definition
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:

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

Emission Unit: U-00001

Emission Unit Description:

Emission unit U-00001 consists of three (3) new Fischer & Krecke flexographic printing presses (FLX05, FLX06 & FLX07) vented to a regenerative thermal oxidizer for control of VOC. The four (4) MAF printing presses (FLXP1, FLXP2, FLXP3 & FLXP4) have been all removed, in which two were 6-color and the other two were 8-color. Three of the MAF printing presses (FLXP1, FLXP2 & FLXP4) were removed when the second Fischer & Krecke Press (FLX06) was installed on 2/28/2003, and the fourth MAF printing press (FLXP3) was removed on 2/28/2003 as well. At the same time the facility began operation of a new Fischer & Krecke flexographic printing press (FLX05) that was incorporated into the first Title V permit, but not operated until 4/1/2002. The two new Fischer & Krecke flexographic printing presses (FLX06 & FLX07) are identical to the FLX05, all three are 10-color printing presses. The Fischer & Krecke press (FLX07) is a proposed future installation.

The facility creates VOC emissions that are processed through a regenerative thermal oxidizer with a destruction efficiency of 95% before emitting to the environment.

In addition to these printing presses, Emission Unit U-00001 consists of Emission Point 00001 for venting emissions of flexographic printing presses and a laminator through a regenerative thermal oxidizer, Process OXD for the regenerative thermal oxidizer, and Emission Source/Control P0OXD/C0OXD for the regenerative thermal oxidizer. In addition, Emission Unit U-00001 has a laminator, identified as Emission Source LAMNT.

Building(s): MAIN

Item 23.2:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

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

Emission Unit: U-00002

Emission Unit Description:

Emission Unit U-00002 consists of a Renzmann Automated Parts Washing System, identified as Emission Source RENZM. Its corresponding emission point is Emission Point 00002, and its corresponding process is Process 010.

Building(s): MAIN

Item 23.3:

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

Emission Unit: U-00003

Emission Unit Description:

Emission Unit U-00003 consists of a 195 HP natural gas fired compressor engine (Compressor # 1), identified as Emission Source COMP1. Its corresponding emission point is Emission Point 00003, and its corresponding process is Process 006.

Building(s): MAIN

Item 23.4:

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

Emission Unit: U-00004

Emission Unit Description:

Emission Unit U-00004 consists of a 195 HP natural gas fired compressor engine (Compressor # 2), identified as Emission Source COMP2. Its corresponding emission point is Emission Point 00004, and its corresponding process is Process 007.

Building(s): MAIN

Item 23.5:

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

Emission Unit: U-00005

Emission Unit Description:

Emission Unit U-00005 consists of a 95 HP natural gas fired compressor engine (Compressor # 3), identified as Emission Source COMP3. Its corresponding emission point is Emission Point 00005, and its corresponding process is Process 008.

Building(s): MAIN

Condition 24: Compliance Certification



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 24.1:

The Compliance Certification activity will be performed for the Facility.

Item 24.2:

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.

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 semi annual 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 semi annual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semi annual 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



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

in the monitoring condition for 6 NYCRR Part 201-6.5(e),
contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 25: Non Applicable requirements
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 25.1:

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.

6NYCRR 231-2

Emission Unit: U00001 Emission Point: 00001 Process: OXD

Reason: This facility is located in a severe ozone non-attainment area. As a result of constructing the Regenerative Thermal Oxidizer (RTO), there is no increase in the Maximum Annual Potential (MAP) of the emission unit, nor for the facility. The existing catalytic oxidizer has a 95% destruction efficiency of VOC and the RTO will have the same destruction efficiency of VOC.

The existing Facility Emission Potential (FEP) is 91 TPY which is greater than the Major Facility VOC threshold of 25 TPY.

The Project Emission Potential (PEP) is 7.4 TPY which is greater than the Significant Source Project Threshold (SSPT) of 2.5 TPY.

The Net Emission Increase (NEI) is NOT greater than the Significant Net Emission Increase Threshold (SNEIT) of 25 TPY.

Therefore, the new oxidizer and resulting emissions and this facility is NOT subject to Part 231-2 (New Source Review).

6NYCRR 231-2

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Reason: Printing press FLX05, which was included in the original Title V (ATV Mod 0), has potential annual emissions greater than 25 tons of volatile organic compounds which exceeds the applicability threshold specified in title 6 of the official compilation of the codes, rules and regulations of the state of New York, subpart 231-2 (NYCRR 231-2), "new source review (NSR) in non attainment areas and ozone transport regions". Ultra flex has chosen to limit the emissions of voc to 24.5 tpy based on a 12-month rolling total to avoid the requirements of 6 NYCRR 231-2.

At all times ultra flex shall satisfy the Permanent Total Enclosure(PTE) requirement for the capture efficiency as specified in USEPA's "Guidelines for determining capture efficiency" method 204. The capture efficiency for VOC emissions from printing operations is assumed to be 100% if the criteria specified in Method 204 for PTE are met. The PTE is an enclosure that completely surrounds a source such that all volatile organic compound emissions are contained and directed to a control device. The PTE at the existing facility is extended to contain the new press. The control device is a natural gas fired Regenerative Thermal Oxidizer (RTO) contained in emission unit U-00001.

The owner or operator of a flexographic printing process subject to this part, shall not operate, cause, allow or permit the operation of such processes unless the capture system and the air cleaning device provide for an overall reduction in volatile organic compound emissions of at least 60.0 percent. To comply with 6NYCRR 231-2, the facility has chosen to limit net emission increase of volatile organic compounds below 25 tons based on 100% capture efficiency of the total room enclosure of the flexographic press and 95% destruction efficiency of each oxidizer. The required overall reduction in voc emissions shall therefore be increased to at least 95% for the oxidizer.

The permitted emission sources contributing to the facility VOC emissions include three flexographic presses (FLX05, FLX06 & FLX07), and a laminator in Emission Unit U-00001, and a renzmann automated washer in Emission Unit U-00002.

The permittee must maintain on an on going basis monthly



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

usage and purchase records of all coatings and solvents utilized at the facility to verify the monthly and annual actual facility wide VOC emission rates.

The permittee shall submit a quarterly report in a format acceptable to the department reporting the following:

- a. monthly volatile organic compounds emissions for the each month of the reporting quarter.
- b. cumulative volatile organic compounds emissions for the consecutive 12- month period, on a monthly basis.

Documentation showing how monthly volatile organic emissions were calculated shall be maintained for a period of five years and made available to the department upon request.

6NYCRR 231-2.2

Reason: The facility's potential emissions for volatile organic compounds exceed the major source threshold of 25 tons in non-attainment areas and ozone transport regions. As a result of the 6 NYCRR Part 231-2 (New Source Review) in non-attainment areas and ozone transport regions applicability evaluation for the proposed replacement of the printing presses, there is an increase of 3.8 tons of VOC in the Maximum Annual Potential (MAP) of the facility. Two (2) new state-of-the-art Fischer & Krecke flexographic printing presses (FLX06 & FLX07) will replace four (4) MAF 140 flexographic printing presses (FLXP1, FLXP2, FLXP3 & FLXP4). Therefore, as a result of the replacement of the printing presses and the VOC emissions increase, the facility is not subject to Part 231-2 (New Source Review).

There is no change in any permitted parameter, or applicable state or federal regulations. The facility will continue its normal daily operations insuring the current limitations on VOC emissions and hours of operations, based on its already permitted potential to emit (PTE of 91 TPY). The facility operates 24 hours/day @ 365 days/year = 8,544 hours/year.

The five-year contemporaneous period is 1998-2003. The facility is in the severe ozone non-attainment area, the



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Facility Emission Potential (FEP) is 91 TPY, which is > the Major Facility Size Threshold (MFST) of 25 TPY for VOC). The facility is > the Major Facility Size Threshold (MFST) of 25 TPY for VOC). The facility is therefore, a major facility.

The Project Emission Potential (PEP) for the replacement of the printing presses is 3.8 TPY, which is > the Significant Source Project Threshold (SSPT) of 2.5 TPY for VOC. PEP = 3.8 TPY > SSPT of 2.5 TPY.

The Net Emission Increase (NEI) for the replacement of the printing presses is 3.8 TPY and is < the Significant Net Emission Increase Threshold (SNEIT) of 25 TPY.

NEI = NEI for replacement of printing presses = 3.8 < SNEIT of 25 TPY

Non-applicability Determination:

There is physical change (different presses) that brings about an increase in Maximum Annual Potential (MAP) emissions of 3.8 tons of VOC. Therefore, the modification project amounts to a total increase in potential emissions of 3.8 TPY. Since the net PTE increase is 3.8 TPY, which is < 25 TPY (SNEIT), Part 231 is not applicable to this facility.

Condition 26: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep copies of emission statements and supporting documents for 5 years.



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2006.

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

Condition 27: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Item 27.2:

Compliance Certification 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 having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions whenever a process is in operation. If any visible emissions are identified, corrective action is required. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 28: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011



Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with section 212.6(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify The Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Reference Test Method: EPA Method 9
Monitoring Frequency: ANNUALLY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 226.2(e)

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep monthly records of materials purchase/usage and other VOC content. Submit quarterly reports giving VOC emissions for each month and cumulative VOC emissions for the 12-month period, on a monthly basis.

General requirements - 5 year record of solvent consumption.

Monitoring Frequency: MONTHLY
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 3 calendar month(s).

Condition 30: Permit Requirements
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.1(a)

Item 30.1:

Every owner or operator of a facility applying for a Title V facility permit or State facility permit, including modifications, must:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

- (1) identify the method(s) (e.g., sampling, testing, etc.), if any, that will be used to comply with the requirements of this Part;
- (2) where applicable, provide a process specific reasonably available control technology (RACT) determination under subdivision 228.3(e) unless the RACT demonstration has already been approved by the Department and the Administrator and a reevaluation frequency for the RACT determination is included in the facility's existing Title V facility permit or State facility permit; and
- (3) where applicable, submit evidence to demonstrate that the shut down of a natural gas fired VOC incinerator pursuant to subdivision 228.3(b) will not jeopardize air quality.

Condition 31: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep monthly records of materials purchase/usage and other VOC content. Submit quarterly reports giving VOC emissions for each month and cumulative VOC emissions for the consecutive 12-month period, on a monthly basis.

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating purchased/used at the facility, must be maintained and, upon request, be submitted to the Department. Records must be maintained at the facility for a period of five years.

Monitoring Frequency: MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 32: Compliance Certification

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 32.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep monthly records of materials purchase/usage and other VOC content. Submit quarterly reports giving VOC emissions and cumulative VOC emissions on a monthly basis and for the consecutive 12-month period.

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 of a period of five years.

The facility shall maintain the following records for each ink, cleaning solvent, and other VOC purchased/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 purchased/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 purchased/used to support the monthly log are to be kept on site.

Monitoring Frequency: MONTHLY



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 33: Applicability of 40CFR 63 Subpart KK
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 33.1:

The provisions of 40CFR63 Subpart KK apply to:

1. Each new and existing facility that is a major source of hazardous air pollutants, as defined in 40CFR63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated, and

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

Condition 34: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.825(e), Subpart KK

Item 34.1:

The Compliance Certification activity will be performed for the Facility.

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators of a facility subject to Subpart KK may calculate the monthly allowable HAP emissions, for demonstrating compliance in accordance with paragraph (b)(6), (c)(1)(xi)(D), (c)(2)(xi)(D), or (d)(1)(xi)(D) of section 63.825 as follows:

1. Determine the as-purchased mass of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month,
2. Determine the as-purchased solids content of each ink, coating, varnish, adhesive, primer, and other

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



solids-containing material applied each month, in accordance with section 63.827(c)(2),

3. Determine the as-purchased mass fraction of each ink, coating, varnish, adhesive, primer, and other solids-containing material which was applied at 20 weight percent or greater solids content, on an as-applied basis,
4. Determine the total mass of each solvent, diluent, thinner, or reducer added to materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, each month,
5. Calculate the monthly allowable HAP emissions using Equation 17 of Subpart KK.

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 35: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.829(b)(1), Subpart KK

Item 35.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Record measurements of control device and capture system operating parameters to demonstrate compliance. Keep records of start up, shutdown, malfunction, maintenance and corrective actions taken for the processes, control equipment and monitoring devices.

Monitoring Frequency: CONTINUOUS



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 36: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 36.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Ultra Flex Packaging Corporation shall demonstrate that its emissions are below the 10 tons per year of any individual HAP and below the 25 tons per year of total HAPs based on a 12-month rolling average by maintaining records of all required measurements and emission calculations of individual HAP and total HAPs. This facility is a minor and not a major source of HAPs. However, this facility is a major source of VOC.

To demonstrate that this facility will continue to be a minor source of HAP, the owner or operator shall maintain records of all required measurements and emissions calculations of individual HAP and total HAPs from all activities at the facility.

These records shall be kept on a monthly basis, and shall include mass of all HAP-containing materials used during the month, and the mass fraction of HAP present in each HAP-containing material used. Please see the condition that is associated with 6 NYCRR 234.4(b)(3) for keeping records of HAPs.

The facility shall maintain records of ink, thinner and solvent purchases, usages and HAP components on a monthly basis. HAP components of ink formulations will be recorded. Purchase/usage will be tracked and emissions



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

will be recorded with and without add-on controls. An overall reduction efficiency of 95% shall be used for purposes of calculating VOC emission when the control system is operating. These records, including the calculations used to determine the emissions, shall be retained on site for a period of at least five years and shall be available for inspection by NYSDEC and/or USEPA inspectors during normal business hours.

The major source thresholds :

individual HAP: 10.0 tons per rolling 12-month period

total HAPs: 25.0 tons per rolling 12-month period

This facility shall demonstrate that its emissions are below the 10 tons per year of any individual HAP and below the 25 tons per year of total HAPs based on a 12-month rolling average by maintaining records of all required measurements and emission calculations of individual HAP and total HAPs. This facility is a minor and not a major source of HAPs. However, this facility is a major source of VOC.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

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

Condition 37: Emission Point Definition By Emission Unit
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 201-6

Item 37.1:

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

Emission Unit: U-00001



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Emission Point: 00001
Height (ft.): 45 Diameter (in.): 54
NYTMN (km.): 4501.55 NYTME (km.): 595.15 Building: MAIN

Item 37.2:

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

Emission Unit: U-00002

Emission Point: 00002
Height (ft.): 20 Diameter (in.): 8
NYTMN (km.): 4501.55 NYTME (km.): 595.15 Building: MAIN

Item 37.3:

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

Emission Unit: U-00003

Emission Point: 00003
Height (ft.): 25 Diameter (in.): 4
NYTMN (km.): 4501.55 NYTME (km.): 595.15 Building: MAIN

Item 37.4:

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

Emission Unit: U-00004

Emission Point: 00004
Height (ft.): 25 Diameter (in.): 4
NYTMN (km.): 4501.55 NYTME (km.): 595.15 Building: MAIN

Item 37.5:

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

Emission Unit: U-00005

Emission Point: 00005
Height (ft.): 25 Diameter (in.): 4
NYTMN (km.): 4501.55 NYTME (km.): 595.15 Building: MAIN

Condition 38: Process Definition By Emission Unit
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 201-6

Item 38.1:

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

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Emission Unit: U-00001

Process: 005

Source Classification Code: 4-05-003-11

Process Description:

Process 005 is the operation of the laminator (Emission Source LAMNT), in which its emissions vent through a regenerative thermal oxidizer. The laminator's corresponding emission point is Emission Point 00001, and its corresponding Emission Unit is U-00001.

Emission Source/Control: COOXD - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: LAMNT - Process

Design Capacity: 15,000 cubic feet per minute

Emission Source/Control: POOXD - Process

Design Capacity: 40,000 cubic feet per minute

Item 38.2:

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

Emission Unit: U-00001

Process: 050

Source Classification Code: 4-05-005-11

Process Description:

Process 050 is the operation of Flexographic Printing Press # 5 (Emission Source FLX05), which is a 10-color flexographic printing press. Its corresponding emission point is Emission Point 00001, and its corresponding Emission Unit is U-00001. At Ultra Flex, Press FLX05 is designated as Press # 1.

Emission Source/Control: FLX05 - Process

Design Capacity: 12,000 cubic feet per minute

Item 38.3:

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

Emission Unit: U-00001

Process: 060

Source Classification Code: 4-05-005-11

Process Description:

Process 060 is the operation of Flexographic Printing Press # 6 (Emission Source FLX06), which is a 10-color flexographic printing press. Its corresponding emission point is Emission Point 00001, and its corresponding



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Emission Unit is U-00001. At Ultra Flex, Press FLX06 is designated as Press # 2.

Emission Source/Control: FLX06 - Process
Design Capacity: 12,000 cubic feet per minute

Item 38.4:

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

Emission Unit: U-00001

Process: 070

Source Classification Code: 4-05-005-11

Process Description:

Process 070 is the operation of Flexographic Printing Press # 7 (Emission Source FLX07), which is a 10-color flexographic printing press. Its corresponding emission point is Emission Point 00001, and its corresponding Emission Unit is U-00001. FLX07 is a proposed future installation. At Ultra Flex, Press FLX07 will be designated as Press # 3.

Emission Source/Control: FLX07 - Process
Design Capacity: 12,000 cubic feet per minute

Item 38.5:

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

Emission Unit: U-00001

Process: OXD

Source Classification Code: 4-05-003-11

Process Description:

Process OXD is the venting of VOC emissions from flexographic printing presses to a Regenerative Thermal Oxidizer (RTO) for control of VOC emissions. VOC destruction efficiency is 95%. Its corresponding Emission Source/Control is P0OXD/C0OXD for the regenerative thermal oxidizer.

The following information was obtained through Anguil, the RTO manufacturer:

Air flow range: 4300-40,000 SCFM from process,
RTO operating temperature: 1500 degrees Fahrenheit,
RTO chamber residence time: 0.75 seconds at full flow
Stack diameter: 54",
Stack elevation: 30' above roof platform
Burner installed capacity: 10.3 MM Btu/hr,
Expected burner usage: 0.6 - 4.8 MM Btu/hr,



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

VOC destruction required: 95%.

Emission Source/Control: C0OXD - Control
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: FLX05 - Process
Design Capacity: 12,000 cubic feet per minute

Emission Source/Control: FLX06 - Process
Design Capacity: 12,000 cubic feet per minute

Emission Source/Control: FLX07 - Process
Design Capacity: 12,000 cubic feet per minute

Emission Source/Control: P0OXD - Process
Design Capacity: 40,000 cubic feet per minute

Item 38.6:

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

Emission Unit: U-00002
Process: 010 Source Classification Code: 4-01-003-99
Process Description:
Process 010 is the operation of the Renzmann Parts Washer System, Model 202-26. Its corresponding emission point is Emission Point 00002, and its corresponding Emission Unit is U-00002.

Emission Source/Control: RENZM - Process
Design Capacity: 4 pounds per hour

Item 38.7:

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

Emission Unit: U-00003
Process: 006 Source Classification Code: 2-02-002-52
Process Description:
Process 006 is the firing of natural gas in the 195 HP compressor engine # 1 (Emission Source COMP1). Its corresponding emission point is Emission Point 00003, and its corresponding Emission Unit is U-00003.

Emission Source/Control: COMP1 - Process
Design Capacity: 195 horsepower (electric)



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Item 38.8:

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

Emission Unit: U-00004

Process: 007

Source Classification Code: 2-02-002-52

Process Description:

Process 007 is the firing of natural gas in the 195 HP compressor engine # 2 (Emission Source COMP2). Its corresponding emission point is Emission Point 00004, and its corresponding Emission Unit is U-00004.

Emission Source/Control: COMP2 - Process

Design Capacity: 195 horsepower (electric)

Item 38.9:

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

Emission Unit: U-00005

Process: 008

Source Classification Code: 2-02-002-52

Process Description:

Process 008 is the firing of natural gas in the 95 HP compressor engine # 3 (Emission Source COMP3). Its corresponding emission point is Emission Point 00005 , and its corresponding Emission Unit is U-00001.

Emission Source/Control: COMP3 - Process

Design Capacity: 95 horsepower (electric)

Condition 39: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.3(b)

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The VOC incinerator used as control equipment must be



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

designed and operated to provide, at a minimum, 80 percent overall removal efficiency. The department may allow an owner or operator of a facility which uses a natural gas fired VOC incinerator as a control device, to shut down the VOC incinerator from November 1st through March 31st for the purposes of natural gas conservation, provided the department has determined that this action will not jeopardize air quality.

Parameter Monitored: VOC

Lower Permit Limit: 80 percent reduction by weight

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 40: Solids as applied
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.3(c)

Item 40.1:

This Condition applies to Emission Unit: U-00001

Item 40.2:

The overall removal efficiency of an air cleaning device used as a control strategy must be determined, for every surface coating formulation, on a solids as applied basis using Equation 2 unless a 85 percent of greater overall removal efficiency is achieved by the air cleaning device. The air cleaning device must be designed and operated to provide, at a minimum, an overall removal efficiency of either 85 percent or as determined by Equation 2.

$$n = \left[1 - \frac{(VOC)c(Vn)a}{(VOC)a(Vn)c} \right] \times 100\% \quad \text{Equation 2}$$

where:

n is the overall removal efficiency

(VOC)c is the maximum permissible pounds of VOC per gallon of coating minus water and excluded VOC at application, as set forth in tables 1 and 2 of 6 NYCRR 228.

(VOC)a is the VOC content of an as applied coating, expressed as pounds of VOC per gallon of coating minus water and excluded VOC

(Vn)c is the volumetric fraction of solids, expressed as gallon of solids per gallon of coating minus water and excluded VOC, in a compliant coating expressed as:

$$(Vn)c = 1 - (Vv)c \quad \text{Equation 3}$$



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

(Vv)c is the volumetric fraction of VOC, expressed as gallon of VOC per gallon of coating minus water and excluded VOC, in a compliant coating expressed as:

$$(Vv)c = \frac{(VOC)c}{dvoc} \quad \text{Equation 4}$$

(Vn)a is the volumetric fraction of solids, expressed as gallon of solids per gallon of coating minus water and excluded VOC, in an as applied coating expressed as:

$$(Vn)a = 1 - (Vv)a \quad \text{Equation 5}$$

(Vv)a is the volumetric fraction of VOC, expressed as gallon of VOC per gallon of coating minus water and excluded VOC, in an as applied coating expressed as:

$$(Vv)a = \frac{(VOC)a}{dVOC} \quad \text{Equation 6}$$

dVOC is the density of VOC as applied, i.e., total volatiles minus water and excluded VOC, in pounds of VOC per gallon of VOC

**Condition 41: Department access to obtain samples.
Effective between the dates of 03/02/2006 and 03/01/2011**

Applicable Federal Requirement: 6NYCRR 228.5(d)

Item 41.1:

This Condition applies to Emission Unit: U-00001

Item 41.2:

Representatives of the Department must be permitted during reasonable business hours, to obtain coating samples for the purpose of determining compliance with 6NYCRR Part 228.

**Condition 42: Removal efficiency- directly measuring VOC/solvent recovery
Effective between the dates of 03/02/2006 and 03/01/2011**

Applicable Federal Requirement: 6NYCRR 228.5(e)(1)

Item 42.1:

This Condition applies to Emission Unit: U-00001

Item 42.2:

When a coating line utilizes control equipment to comply with the provisions of this Part, test methods acceptable to the department must be used to determine the overall removal efficiency during a required



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

performance test. This determination may be made by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment.

Condition 43: Demonstration of efficiency other than VOC/solvent recovery
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.5(e)(2)

Item 43.1:

This Condition applies to Emission Unit: U-00001

Item 43.2:

When a coating line utilizes control equipment to comply with the provisions of Part 228, test methods acceptable to the department must be used when to determine the overall removal efficiency. For control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment.

Condition 44: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.5(f)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner and/or operator of a surface coating process must follow notification requirements, protocol requirements and test procedures of Part 202 of this Title for testing and monitoring. Depending upon conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 (see Table 1, section 200.9 of this Title) must be used when measuring VOC concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



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

(2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 45: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.10

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Part must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

(g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:

(1) an enclosed spray gun cleaning system that is kept closed when not in use;

(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 46: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 46.1:

The Compliance Certification activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 46.2:

Compliance Certification 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 for an overall reduction in volatile organic compound emissions of at least 60 percent. Stack emissions testing used to verify compliance with this limit should be conducted at least once during the term of the permit or more frequently upon request of the regulatory agency. Stack testing is required to be conducted once during the term of the permit.

Manufacturer Name/Model Number: ANGUIL MODEL 400 RTO

Parameter Monitored: VOC

Lower Permit Limit: 60 percent reduction by weight

Reference Test Method: 40 CFR 60 Method 25

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 47: control requirements

Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 47.1:

This Condition applies to Emission Unit: U-00001

Item 47.2:

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 48: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 48.1:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 48.2:

Compliance Certification 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 percent

Monitoring Frequency: CONTINUOUS

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

**Condition 49: control requirement-other than VOC/solvent recovery
Effective between the dates of 03/02/2006 and 03/01/2011**

Applicable Federal Requirement: 6NYCRR 234.4(a)

Item 49.1:

This Condition applies to Emission Unit: U-00001

Item 49.2:

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 50: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011**

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

Item 50.1:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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

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.

Parameter Monitored: VOC

Lower Permit Limit: 60 percent

Reference Test Method: Per 234.4(b)

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 51: control requirement

Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 51.1:

This Condition applies to Emission Unit: U-00001

Item 51.2:

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:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

(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 52: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 52.2:

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.



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log should include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 53: Compliance dates for new and reconstructed sources
Effective between the dates of 03/02/2006 and 03/01/2011**

Applicable Federal Requirement: 40CFR 63.6(b)(2), Subpart A

Item 53.1:

This Condition applies to Emission Unit: U-00001

Item 53.2:

Except as provided in paragraphs (b)(3) and (b)(4) of this section, the owner or operator of a new or reconstructed source that has a initial startup date after the effective date of a relevant standard established under this part pursuant to section 112(d), 112(f), or 112(h) of the Act shall comply with such standard upon startup of the source

**Condition 54: Monitoring of capture system and control device parameters
Effective between the dates of 03/02/2006 and 03/01/2011**

Applicable Federal Requirement: 40CFR 63.825(f)(3), Subpart KK

Item 54.1:

This Condition applies to Emission Unit: U-00001

Item 54.2:

The owner or operator of each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance through performance tests of capture efficiency and control device efficiency and continuous compliance through continuous monitoring of capture system and control device operating parameters shall:

1. Monitor an operating parameter established in accordance with section 63.828(a)(4) to assure control device efficiency, and
2. For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with section 63.828(a)(5) to assure capture efficiency, and
3. Determine the organic HAP emissions for those presses served by each capture system delivering emissions to that oxidizer according to the requirements of 40CFR63.825(f)(3)(iii)(A) or (B).



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Condition 55: Compliance date for an existing source
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.826(a), Subpart KK

Item 55.1:

This Condition applies to Emission Unit: U-00001

Item 55.2: The compliance date for an owner or operator of an existing affected source subject to 40CFR63 Subpart KK is May 30, 1999.

Condition 56: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.827(d), Subpart KK

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 56.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A performance test of a control device to determine destruction efficiency for the purpose of meeting the emission standards of Subpart KK shall be conducted by the owner or operator in accordance with the following:

1. An initial performance test to establish the destruction efficiency of an oxidizer and the associated combustion zone temperature for a thermal oxidizer (or the associated catalyst bed inlet temperature for a catalytic oxidizer) shall be conducted and the data reduced in accordance with the reference methods and procedures outlined in 63.827(d)(1)(i) through 63.827(d)(1)(ix).
2. The owner or operator shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunctions shall not constitute representative conditions for the purpose of a performance test.

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



3. For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuous compliance, the time-weighted average of the values recorded during the performance test shall be computed. For an oxidizer other than a catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum combustion temperature. For a catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the emission standards of Subpart KK.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 95 percent reduction by weight

Reference Test Method: EPA Ref Method 25

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 57: Calibration of temperature monitoring equipment
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.828(a)(2)(ii), Subpart KK

Item 57.1:

This Condition applies to Emission Unit: U-00001

Item 57.2:

All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced.

The replacement shall be done either if the owner chooses not to perform the calibration or if the equipment can not be calibrated properly.

Condition 58: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.828(a)(4)(i), Subpart KK

Item 58.1:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 58.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

An owner or operator complying with the requirements of 40 CFR 63.824-63.825 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall:

For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of +/- 1 percent of the temperature being monitored in degrees Celsius or +/- 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

Manufacturer Name/Model Number: ANGUIL MODEL 400 RTO

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 59: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.828(a)(4)(ii), Subpart KK

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 59.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Install, calibrate, maintain and operate temperature
monitor in the combustion chamber of the oxidizer.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

**Condition 60: Continuous parameter monitoring for capture efficiency
Effective between the dates of 03/02/2006 and 03/01/2011**

Applicable Federal Requirement: 40CFR 63.828(a)(5), Subpart KK

Item 60.1:

This Condition applies to Emission Unit: U-00001

Item 60.2:

An owner or operator complying with the requirements of sections 63.824-63.825 through the use of a control device and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained shall:

1. Submit to the Administrator with the compliance status report required by section 63.9(h) of the General Provisions, a plan that:

- A) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained,
- B) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and
- C) Identifies the specific monitoring procedures;

2. Set the operating parameter value, or range of values, that demonstrate compliance with sections 63.824-63.825, and



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

3. Conduct monitoring in accordance with the plan submitted to the Administrator unless comments received from the Administrator require an alternative monitoring scheme.

Condition 61: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.828(a)(5)(iii), Subpart KK

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 61.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Monitor operating parameter pressure differential across enclosure to ensure 100% capture efficiency of collecting organic HAP emissions into a closed-vent system that exhausts to the RTO.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: -0.007 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 62: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 62.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Item 62.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to 40CFR Part 63 Subpart KK shall maintain the following records (as specified in paragraphs (b)(1) through (b)(3) of Section 63.829) on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):

(1) Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

(2) Records specified in 40CFR63.10(b)(3), for each applicability determination performed by the owner or operator in accordance with the requirement in 40CFR63.820(a), and

(3) Records specified in 40CFR63.10(c) for each continuous monitoring system operated by the owner or operator in accordance with the requirements of 40CFR63.828(a).

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 63: Notification of performance test

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.830(b)(2), Subpart KK

Item 63.1:

This Condition applies to Emission Unit: U-00001

Item 63.2:

Each owner or operator of an affected source subject to 40CFR63 Subpart KK shall submit a Notification of Performance Test, as specified in Section 63.7 and Section 63.9(e) of 40CFR Part 63.

This notification, and the site-specific test plan required under Section 63.7(c)(2), shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

considered to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.

Condition 64: Notification of compliance status
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.830(b)(3), Subpart KK

Item 64.1:

This Condition applies to Emission Unit: U-00001

Item 64.2:

Each owner or operator of an affected source subject to 40CFR63 Subpart KK shall submit a Notification of Compliance Status, as specified in 40CFR63.9(h), to the Department.

Condition 65: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.5(g)(2)

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 65.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Continuously monitor temperature of the combustion
chamber of the oxidizer.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Condition 66: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001

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

Item 66.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The minimum combustion chamber temperature shall be 1500 degrees Fahrenheit. The temperature of the oxidizer that is used to comply with 6NYCRR Part 234 shall be monitored continuously.

The continuous monitor shall be installed and periodically calibrated according to the manufacturer's instructions, and shall be operated at all times that the oxidizer is operating.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1500 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

**Condition 67: Control requirements for product and packaging rotogravure
or wide-web flexographic presses**
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.825(b)(7), Subpart KK

Item 67.1:

This Condition applies to Emission Unit: U-00001 Emission Point: 00001

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Item 67.2:

The owner or operator of a product and packaging rotogravure or a wide-web flexographic printing press that is utilizing a control device to comply with subpart KK shall operate the capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95% for each month.

Monitoring of the control device must be performed in accordance with specifications described in Subpart KK.

Condition 68: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.825(d)(1), Subpart KK

Item 68.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 68.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

To demonstrate compliance with the overall organic HAP control efficiency requirements in section 63.825(b)(7) or the overall organic HAP emission rate limitation requirements in section 63.825(b)(8)-(10), each owner or operator using an oxidizer to control emissions shall show compliance by following the procedures in either paragraph (d)(1) or (d)(2) of section 63.825.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1500 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 69: Compliance with capture and control requirements



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.825(h)(3), Subpart KK

Item 69.1:

This Condition applies to Emission Unit: U-00001 Emission Point: 00001

Item 69.2:

If a Subpart KK-affected source operates more than one capture system or more than one control device, and has no never-controlled work stations and no intermittently-controllable work stations, then the affected source is in compliance with the 95 percent overall organic HAP control efficiency requirement for the month if all three of the following conditions are met:

1. For each press or group of presses controlled by a common control device, the overall organic HAP control efficiency, as determined by paragraphs (d)(1)(i)-(iii) and (d)(1)(x) of section 63.825 for each press or group of presses served by that control device and a common capture system, must be equal to or greater than 95 percent,
2. The oxidizer must be operated such that the average operating parameter value is greater than the operating parameter value established in accordance with section 63.828(a)(4) for each three hour period, and
3. The average capture system operating parameter value for each capture system serving that control device must be greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with section 63.828(a)(5) for each three hour period.

Condition 70: Procedure for determining capture efficiency

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.827(e)(1), Subpart KK

Item 70.1:

This Condition applies to Emission Unit: U-00001 Emission Point: 00001

Item 70.2:

A performance test to determine the capture efficiency of each capture system venting organic emissions to a control device, for the purpose of meeting the requirements of sections 63.824(b)(1)(ii), 63.824(b)(2), 63.825(c)(2), 63.825(d)(1)-(2), 63.825(f)(2)-(4), or 63.825(h)(2)-(3), shall be conducted by the owner or operator.

For Permanent Total Enclosures, capture efficiency shall be assumed as 100 percent. Procedure T-"Criteria for the Verification of a Permanent or Temporary Total Enclosure", as found in appendix B to 40CFR52.741, shall be used to confirm that an enclosure meets the requirements for Permanent Total Enclosure.

Condition 71: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011



Applicable Federal Requirement: 6NYCRR 228.5(g)(2)

Item 71.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 005 Emission Source: LAMNT

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

Item 71.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Continuously monitor temperature of the combustion
chamber of the oxidizer.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1500 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 72: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.10(a)

Item 72.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 005 Emission Source: LAMNT

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

Item 72.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 73: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.10(b)

Item 73.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 005 Emission Source: LAMNT

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

Item 73.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 74: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Applicable Federal Requirement: 6NYCRR 228.10(c)

Item 74.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 005 Emission Source: LAMNT

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

Item 74.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 75: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.10(d)

Item 75.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 005 Emission Source: LAMNT

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

Item 75.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 76: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 228.10(e)

Item 76.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 005 Emission Source: LAMNT

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

Item 76.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 77: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 77.1:

The Compliance Certification activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Emission Unit: U-00001 Emission Point: 00001
Process: 050 Emission Source: FLX05

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

Item 77.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep monthly records of materials usage and their VOC content. Submit quarterly reports giving VOC emissions for each month and cumulative VOC emissions for the consecutive 12-month period, on a monthly basis.

Monitoring Frequency: MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 78: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(a)

Item 78.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 050 Emission Source: FLX05

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

Item 78.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 79: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(b)

Item 79.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 050 Emission Source: FLX05

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

Item 79.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 80: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(c)

Item 80.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 050 Emission Source: FLX05



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

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

Item 80.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 81: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(d)

Item 81.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 050 Emission Source: FLX05

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

Item 81.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

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

Condition 82: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.829(b)(1), Subpart KK

Item 82.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 050 Emission Source: FLX05

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 82.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Record measurements of control device and capture system operating parameters to demonstrate compliance. Keep records of startup, shutdown, malfunction, maintenance and corrective actions taken for the processes, control equipment and monitoring devices.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 83: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 83.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 060 Emission Source: FLX06

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



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Item 83.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep monthly records of materials usage and their VOC content. Submit quarterly reports giving VOC emissions for each month and cumulative VOC emissions for the consecutive 12-month period, on a monthly basis.

Monitoring Frequency: MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 84: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 84.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 060 Emission Source: FLX06

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 84.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Continuously monitor temperature of the combustion chamber of the oxidizer.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

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

Condition 85: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(a)

Item 85.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 060 Emission Source: FLX06

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

Item 85.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 86: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(b)

Item 86.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 060 Emission Source: FLX06

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

Item 86.2:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 87: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(c)

Item 87.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 060 Emission Source: FLX06

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

Item 87.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 88: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Applicable Federal Requirement: 6NYCRR 234.6(d)

Item 88.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 060 Emission Source: FLX06

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

Item 88.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 89: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.829(b)(1), Subpart KK

Item 89.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 060 Emission Source: FLX06

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 89.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Record measurements of control device and capture system operating parameters to demonstrate compliance. Keep records of startup, shutdown, malfunction, maintenance and corrective actions taken for the processes, control equipment and monitoring devices.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 90: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 90.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001

Process: 070 Emission Source: FLX07

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 90.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep monthly records of materials usage and their VOC content. Submit quarterly reports giving VOC emissions for each month and cumulative VOC emissions for the consecutive 12-month period, on a monthly basis.

Monitoring Frequency: MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 91: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(a)



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Item 91.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 070 Emission Source: FLX07

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

Item 91.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 92: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(b)

Item 92.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 070 Emission Source: FLX07

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

Item 92.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 93: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(c)

Item 93.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001

Process: 070 Emission Source: FLX07

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 93.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 94: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.6(d)

Item 94.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Process: 070

Emission Source: FLX07

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 94.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Keep all containers used to store or dispose of cloth or paper impregnated with VOC closed. Keep containers used to store spent or fresh VOC containing materials closed except for sampling or inspection or material transfer.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 95: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 40CFR 63.829(b)(1), Subpart KK

Item 95.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001

Process: 070 Emission Source: FLX07

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 95.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Record measurements of control device and capture system operating parameters to demonstrate compliance. Keep records of startup, shutdown, malfunction, maintenance and corrective actions taken for the processes, control equipment and monitoring devices.

Monitoring Frequency: CONTINUOUS



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 96: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 96.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: OXD

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

Item 96.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Automated and charted combustion chamber temperature readings. Continuously record combustion chamber temperature. The Test Reference Method should be according to the manufacturer's specifications that is in the RTO's operating manual.

Manufacturer Name/Model Number: ANGUIL MODEL RTO

Lower Permit Limit: 1500 degrees Fahrenheit

Reference Test Method: RTO's oper manual

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 97: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 234.3(a)

Item 97.1:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: OXD Emission Source: COOXD

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

Item 97.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Any time that any of the flexographic printing presses is operating, the Regenerative Thermal Oxidizer (RTO) must be started and allowed to reach operating temperature (minimum of 1500 degrees Fahrenheit) prior to starting the presses. According to the manufacturer's Operation and Maintenance Manual for the RTO, if the presses are started before the RTO is at operating temperature, the solvent laden air from the printing operation will be automatically aborted to the atmosphere until the oxidizer attains operating temperature and comes on line.

The temperature in the RTO (a minimum inlet temperature of 1500 degrees Fahrenheit) must be continuously monitored and calibrated according to the manufacturer's instructions and must be operated at all times that the RTO is operated which is whenever any of the printing presses are operating.

The facility shall comply with 6 NYCRR 200.7 which requires the emission control device, the RTO, to be kept 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.

Manufacturer Name/Model Number: ANGUIL MODEL 400 RTO
Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1500 degrees Fahrenheit
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 98: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

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

Item 98.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001

Process: OXD Emission Source: C0OXD

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 98.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Automated and charted regenerative thermal oxidizer (RTO) combustion chamber temperature readings. The continuous monitor shall be installed and periodically calibrated according to the manufacturer's instructions, and shall be operated at all times that the RTO is operating.

Manufacturer Name/Model Number: ANGUIL MODEL 400 RTO

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 99: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 226.2



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Item 99.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 99.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall conduct solvent metal cleaning unless:

- (1) Solvent is stored in covered containers and waste solvent is transferred or disposed of in such a manner that less than 20 percent of the waste solvent, by weight, can evaporate into the atmosphere;
- (2) Equipment used in solvent metal cleaning is maintained to minimize leaks and fugitive emissions;
- (3) Equipment used in solvent metal cleaning displays a conspicuous summary of proper operating procedures consistent with minimizing emissions of volatile organic compounds; and
- (4) Equipment covers are closed when the solvent metal cleaning unit is not in service.
- (5) A record of solvent consumption shall be maintained for each year and make available to the commissioner or his representative upon request.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 100: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 226.2(a)

Item 100.1:

The Compliance Certification activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Emission Unit: U-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 100.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Store solvent in covered containers; transfer waste solvent to limit loss to 20 percent; minimize leaks and fugitive emissions; display proper operating procedures; keep cover closed when not in use; record solvent consumption.

General requirements - solvent storage, 20% loss.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 101: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 226.3(a)

Item 101.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 101.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Equipment with easily operated cover; equipment with internal (under cover) drainage, if practical.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 102: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 226.4(a)

Item 102.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00002

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

Item 102.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Drain cleaned parts at least 15 seconds or until dripping ceases.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 103: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 227-1.3(a)(1)

Item 103.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00003 Emission Point: 00003
Process: 006 Emission Source: COMP1

Item 103.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Operate according to manufacturer's specifications.

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 104: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 227-1.3(a)(2)

Item 104.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00003 Emission Point: 00003

Process: 006 Emission Source: COMP1

Item 104.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operate according to manufacturer's specifications.

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 105: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 227-1.3(a)(1)



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Item 105.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00004 Emission Point: 00004
Process: 007 Emission Source: COMP2

Item 105.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operate according to manufacturer's specifications.

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

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

Condition 106: Compliance Certification

Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 227-1.3(a)(2)

Item 106.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00004 Emission Point: 00004
Process: 007 Emission Source: COMP2

Item 106.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operate according to manufacturer's specifications.

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 107: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 227-1.3(a)(1)

Item 107.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00005 Emission Point: 00005
Process: 008 Emission Source: COMP3

Item 107.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operate according to manufacturer's specifications.

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 108: Compliance Certification
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable Federal Requirement: 6NYCRR 227-1.3(a)(2)

Item 108.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00005 Emission Point: 00005
Process: 008 Emission Source: COMP3

Item 108.2:

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operate according to manufacturer's specifications.

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2006.

Subsequent reports are due every 6 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 applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 109: Contaminant List
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable State Requirement: ECL 19-0301

Item 109.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 110: Unavoidable noncompliance and violations
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable State Requirement: 6NYCRR 201-1.4

Item 110.1:

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.



New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149

(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.

(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 111: Air pollution prohibited
Effective between the dates of 03/02/2006 and 03/01/2011

Applicable State Requirement: 6NYCRR 211.2

Item 111.1:

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.