



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 2-6105-00149/00006
Mod 0 Effective Date: 03/15/2011 Expiration Date: 03/14/2016
Mod 1 Effective Date: 11/05/2013 Expiration Date: 03/14/2016

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 2, Mod 1)

This modification is for replacing an existing linear laminator with new linear laminator.

This project is a minor modification for the installation of one (1) new Nordmeccanica Duplex Combi linear laminator, Model 1500 (59") with one (1) laminating station. The new laminator is capable of utilizing water based and solvent based coatings and adhesives.

This modification application is for an "in kind" replacement of equipment. The Nordmeccanica Duplex Combi linear laminator will be replacing the existing Schiavi Laminator which will be removed from operation at the facility. The facility's potential to emit (PTE) will remain the same (unchanged).

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



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
 NYSDEC
 47-40 21ST ST
 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 compliance 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 any 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, modifications and transfers
 - Permit modifications, suspensions or revocations by the Department
 - Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application 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, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

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:

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 1-1: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-1.1:

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

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

Condition 4: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Expired by Mod No: 1

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 application for permit modification or renewal - REGION 2 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 2 Headquarters

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



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

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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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

Mod 0 Permit Effective Date: 03/15/2011

Permit Expiration Date: 03/14/2016

Mod 1 Permit Effective Date: 11/05/2013

Permit Expiration Date: 03/14/2016



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 1-1 6 NYCRR 201-6.4 (a) (7): Fees
- 1-2 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance
Monitoring
- 1-3 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and
Measurement
- 1-4 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 1-5 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 1-6 6 NYCRR 201-1.7: Recycling and Salvage
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected
Contaminants to the air
- 1-7 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 1-8 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 1-9 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 1-10 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 1-11 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 19 6 NYCRR 202-1.1: Required Emissions Tests
- 20 40 CFR Part 68: Accidental release provisions.
- 21 40 CFR 82, Subpart F: Recycling and Emissions Reduction
- 22 6 NYCRR Subpart 201-6: Emission Unit Definition
- 1-12 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 1-13 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 24 6 NYCRR 201-6.5 (g): Non Applicable requirements
- *25 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *26 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 27 6 NYCRR 202-2.5: Compliance Certification
- 1-14 6 NYCRR 211.1: Air pollution prohibited
- 28 6 NYCRR 212.6 (a): Compliance Certification
- 29 6 NYCRR 212.6 (a): Compliance Certification
- 30 6 NYCRR 226.2 (e): Compliance Certification
- 31 6 NYCRR 227-1.3 (a): Compliance Certification
- 32 6 NYCRR 228-1.1 (a): Permit Requirements
- 1-15 6 NYCRR 228-1.1 (a): Compliance Certification
- 1-16 6 NYCRR 228-1.3 (a): Compliance Certification
- 1-17 6 NYCRR 228-1.3 (b): Compliance Certification
- 1-18 6 NYCRR 228-1.3 (b): Compliance Certification
- 1-19 6 NYCRR 228-1.3 (b) (1): Compliance Certification
- 1-20 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 1-21 6 NYCRR 228-1.3 (d): Compliance Certification



- 1-22 6 NYCRR 228-1.4 (d) (1): Compliance Certification
- 1-23 6 NYCRR 228-1.5 (a): Compliance Certification
- 1-24 6 NYCRR 228-1.5 (b): Compliance Certification
- 1-25 6 NYCRR 228-1.5 (c): Compliance Certification
- 1-26 6 NYCRR 228-1.5 (e) (1): Compliance Certification
- 1-27 6 NYCRR 228-1.6 (d): Compliance Certification
- 1-28 6 NYCRR 228-1.6 (e): Compliance Certification
- 1-29 6 NYCRR 228-1.6 (f) (1): Compliance Certification
- 1-30 6 NYCRR 228-1.6 (f) (2): Compliance Certification
- 1-31 6 NYCRR 228-2.5 (c): Compliance Certification
- 35 6 NYCRR 234.4 (b): Compliance Certification
- 1-32 40CFR 63, Subpart KK: Compliance Certification
- 36 40CFR 63.820(a), Subpart KK: Applicability of 40CFR 63 Subpart KK
- 37 40CFR 63.825(e), Subpart KK: Compliance Certification
- 38 40CFR 63.829(b)(1), Subpart KK: Compliance Certification
- 39 40CFR 63.829(d), Subpart KK: Compliance Certification

Emission Unit Level

- 40 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 41 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=U-00001

- 50 6 NYCRR 234.3 (a) (1) (i): Compliance Certification
- 51 40CFR 63.6(b)(2), Subpart A: Compliance dates for new and reconstructed sources
- 52 40CFR 63.825(f)(3), Subpart KK: Monitoring of capture system and control device parameters
- 53 40CFR 63.826(a), Subpart KK: Compliance date for an existing source
- 54 40CFR 63.827(d), Subpart KK: Compliance Certification
- 55 40CFR 63.828(a)(2)(ii), Subpart KK: Calibration of temperature monitoring equipment
- 56 40CFR 63.828(a)(4)(i), Subpart KK: Compliance Certification
- 57 40CFR 63.828(a)(4)(ii), Subpart KK: Compliance Certification
- 58 40CFR 63.828(a)(5), Subpart KK: Continuous parameter monitoring for capture efficiency
- 59 40CFR 63.828(a)(5)(iii), Subpart KK: Compliance Certification
- 60 40CFR 63.829(b), Subpart KK: Compliance Certification
- 61 40CFR 63.830(b)(2), Subpart KK: Notification of performance test
- 62 40CFR 63.830(b)(3), Subpart KK: Notification of compliance status

EU=U-00001,EP=00001

- 64 6 NYCRR 234.4 (c): Compliance Certification
- 65 40CFR 63.825(b)(7), Subpart KK: Control requirements for product and packaging rotogravure or wide-web flexographic presses
- 66 40CFR 63.825(d)(1), Subpart KK: Compliance Certification
- 67 40CFR 63.825(h)(3), Subpart KK: Compliance with capture and control requirements
- 68 40CFR 63.827(e)(1), Subpart KK: Procedure for determining capture efficiency
- 1-33 6 NYCRR 228-2.5 (a): Compliance Certification
- 1-34 6 NYCRR 228-2.5 (c): Compliance Certification
- 1-35 6 NYCRR 228-1.3 (b) (1): Compliance Certification



EU=U-00001,EP=00001,Proc=005,ES=LAMN1

- 1-36 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 1-37 6 NYCRR 228-1.6 (c): Surface coating access for sampling
- 1-38 6 NYCRR 228-1.6 (e): VOC content of gas stream test methods
- 1-39 6 NYCRR 228-2.5 (b): Compliance Certification
- 1-40 6 NYCRR 228-2.5 (d): Compliance Certification

EU=U-00001,EP=00001,Proc=005,ES=LAMN2

- *69 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 70 6 NYCRR 228-1.5: Compliance Certification

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

- 83 6 NYCRR 234.4 (b): Compliance Certification
- 84 6 NYCRR 234.6: Compliance Certification
- 85 40CFR 63.829(b)(1), Subpart KK: Compliance Certification

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

- 86 6 NYCRR 234.4 (b): Compliance Certification
- 87 6 NYCRR 234.6: Compliance Certification
- 88 40CFR 63.829(b)(1), Subpart KK: Compliance Certification

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

- 89 6 NYCRR 234.4 (b): Compliance Certification
- 90 6 NYCRR 234.6: Compliance Certification
- 91 40CFR 63.829(b)(1), Subpart KK: Compliance Certification

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

- 92 6 NYCRR 234.4 (c): Compliance Certification

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

- 93 6 NYCRR 234.3 (a) (1) (ii) ('d'): Compliance Certification
- 94 6 NYCRR 234.4 (c): Compliance Certification

EU=U-00002

- 95 6 NYCRR 226.2: Compliance Certification
- 96 6 NYCRR 226.3 (a): Compliance Certification
- 97 6 NYCRR 226.4 (a): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 98 ECL 19-0301: Contaminant List
- 1-41 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 99 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 100 6 NYCRR 211.2: Visible Emissions Limited

NOTE: * preceding the condition number indicates capping.



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 - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (a) (4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.4 (a) (6)

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



Item I: Severability - 6 NYCRR 201-6.4 (a) (9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR 201-6.4 (g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR 201-6.4 (i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is



three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item 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 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

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

Condition 1-1: Fees
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)

Item 1-1.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 1-2: Recordkeeping and Reporting of Compliance Monitoring
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 201-6.4 (c)



Item 1-2.1:

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 201-6.2 of Part 201.

**Condition 1-3: Records of Monitoring, Sampling, and Measurement
Effective between the dates of 11/05/2013 and 03/14/2016**

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (2)

Item 1-3.1:

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

**Condition 1-4: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016**

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)

Item 1-4.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-4.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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.
- (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

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Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(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.

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 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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



Condition 1-5: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)

Item 1-5.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of 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:

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 1/30/2012.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 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,

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Albany NY 12233-3251

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 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 - Prohibitions
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.



- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**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 03/15/2011 and 03/14/2016**

Applicable Federal Requirement:6 NYCRR 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 specifications, required to operate such device effectively.

**Condition 1-6: Recycling and Salvage
Effective between the dates of 11/05/2013 and 03/14/2016**

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 1-6.1:

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.



Condition 11: Recycling and Salvage
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 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 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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

Condition 1-7: Exempt Sources - Proof of Eligibility
Effective between the dates of 11/05/2013 and 03/14/2016

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

Item 1-7.1:

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 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 1-8: Trivial Sources - Proof of Eligibility
Effective between the dates of 11/05/2013 and 03/14/2016



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

Item 1-8.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 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, 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 1-9: Requirement to Provide Information
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)

Item 1-9.1:

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 1-10: Right to Inspect
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 1-10.1:

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 1-11: Off Permit Changes

Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)

Item 1-11.1:

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 201-6.4 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests

Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 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.

Condition 20: Accidental release provisions.

Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:40 CFR Part 68

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Item 20.1:

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 21: Recycling and Emissions Reduction
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:40CFR 82, Subpart F

Item 21.1:

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 22: Emission Unit Definition
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 22.1(From Mod 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 two (2) laminators (Emission Sources LAMN1 & LAMN2) and three (3) Fischer & Krecke flexographic printing presses (Emission Sources FLX05, FLX06 & FLX07). The emissions from the two laminators (one is a replacement) and the emissions from



the three printing presses are vented to Emission point 00001 and then to a natural gas fired regenerative thermal oxidizer (Emission Source/Control P00XD/C00XD) for control of the VOC. Process OXD is for the operation of the regenerative thermal oxidizer (RTO). The three printing presses, FLX05, FLX06 and FLX07 are all identical to each other and each press is a 12,000 cubic feet per minute Fischer & Krecke 10-color printing press. The replaced laminator is a 1,500 cubic feet per minute Nordmeccanica Duplex Combi linear laminator (Emission Source LAMN1), and the other laminator is a 20,000 cubic feet per minute Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 (Emission Source LAMN2).

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

Building(s): MAIN

Item 22.2(From Mod 0):

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

Condition 1-12: Progress Reports Due Semiannually

Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)

Item 1-12.1:

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 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 1-13: Non Applicable requirements
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 201-6.4 (g)

Item 1-13.1:

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.

(From Mod 1) 6 NYCRR Subpart 231-2
Reason: New Source Review (6 NYCRR 231-2) is not applicable to this modification. This modification application is for an "in kind" replacement of equipment. The Nordmeccanica Duplex Combi linear laminator will be replacing the existing Schiavi Laminator which will be removed from operation at the facility on 12/15/2013. The facility's potential to emit (PTE) will remain the same (unchanged).

Condition 24: Non Applicable requirements
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 24.1:

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.

6 NYCRR Subpart 231-2
Emission Unit: U00001 Emission Point: 00001
Reason: Non-Attainment NSR Applicability:

The Ultra Flex Packaging Corporation is currently an existing major facility for VOC. For each regulated NSR contaminant, the project emission potential is determined only for modifications at existing facilities. The project emission potential must consider only the proposed emission increases, and for existing emission sources at a major facility, it is calculated as the difference between the baseline actual emissions and the projected actual emissions of the emission source. Or, for new emission sources, as the sum of the potential to emit of each emission source. The baseline period established for the Ultra Flex Packaging Corporation is November 2005 through



October 2007. The baseline period is defined as any 24 consecutive months within the 5 years immediately preceding the date of commencement.

The installation and operation of a new Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 with 2 laminating stations. In order to avoid New Source Review applicability, the facility is choosing to limit the VOC emissions from this new source at 24 tpy.

Installation of one (1) 20,000 cubic feet per minute new Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 with two (2) laminating stations (Emission Source LMIN2). The new laminator is capable of utilizing solvent, solvent-less, and aqueous laminating formulations.

The facility is requesting that the emission limit for this lamination process be capped at 24 tons/year, thus not triggering Part 231-2 (New Source Review) at the Ultra Flex Packaging Corporation results in a "Project Emission Potential" (PEP) of 42.09 TPY. These proposed changes result in a minor modification to emission unit U-00100 only. For the Ultra Flex Packaging Corporation to be subject to New Source Review permitting obligations, this project would need to have a PEP of greater than 25 TPY VOC (the significant project threshold for severe non-attainment areas). The demonstrated PEP (42.09TPY) is less than 25 TPY and is not subject to Part 231.5 NSR permitting.

The proposed project must exceed the significant source project threshold of 25 TPY VOC to trigger NSR program applicability. The calculations summarized below demonstrate that the future potential emissions, less prior actual emissions, are below the NSR program applicability threshold of 25 TPY VOC.

Baseline Actual Emissions:

Baseline Actual Average (November 2005 - October 2007) =
Installation and operation of the new laminator = 47.77
TPY of VOC

Projected Actual Emissions are defined as the maximum annual rate, in TPY, at which an existing emission source is projected to emit a regulated NSR contaminant in any one of the five years (12-month period) after a modification. Projected Actual Emissions for sources within the project boundary are presented as follows:



Projected Actual Emissions = 5.68 TPY of VOC after 95% degree of destruction by the RTO

Major Nonattainment NSR Applicability Calculation:

Project Emission Potential = Projected Actual Emissions
- Baseline Actual Emissions =
=

47.77	-	5.68	=
=			=

42.09 tpy of VOC

Since the demonstrated PEP (42.09 TPY) is more than the NSR program applicability threshold of 25 TPY of VOC, therefore; the project is subject to Part 231.5 NSR permitting. But, the facility is choosing to cap the VOC emissions at 24 tpy of VOC, which is less than the threshold of 25 tpy. Therefore, the project is not subject to NSR or Part 231-2.

Condition 25: Capping Monitoring Condition
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 25.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40 CFR Part 63, Subpart KK

Item 25.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 25.3:

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

Item 25.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time

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period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 25.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 25.6:

The Compliance Certification activity will be performed for the Facility.

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

Item 25.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility is required to demonstrate that the facility's 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 any individual HAP and total HAPs from all activities at the facility. Records must be maintained at the facility for a period of five (5) years. This facility is a major source of VOC, but a minor source of HAPs.

A list of Hazardous Air Pollutants (HAPs) can be found in 6 NYCRR 200.1(ag).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 10 tons per year

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 7/30/2011.

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

Condition 26: Capping Monitoring Condition
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 26.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the

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purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40 CFR Part 63, Subpart KK

Item 26.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 26.3:

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

Item 26.4:

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

Item 26.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 26.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 26.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility is required to demonstrate that the facility's 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 any individual HAP and total HAPs from all activities at the facility. Records must be maintained at the facility for a period of five (5) years. This facility is a major source of VOC, but a minor source of HAPs.

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A list of Hazardous Air Pollutants (HAPs) can be found in
6 NYCRR 200.1(ag).

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: INKS, SOLVENTS AND ADHESIVES
Parameter Monitored: TOTAL HAP
Upper Permit Limit: 25 tons per year
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 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 27.2:

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.

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 1/30/2012.

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

Condition 1-14: Air pollution prohibited
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 211.1

Item 1-14.1:

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,

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pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 28: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 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: 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 7/30/2011.

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

Condition 29: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

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.

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 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 30: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 226.2 (e)

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 30.2:

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 4/30/2011.

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

Condition 31: Compliance Certification

Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Item 31.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one 6 minute period per hour of not more than 27 percent opacity. 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 investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.



The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Method 9
Monitoring Frequency: DAILY
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 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 32: Permit Requirements
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-1.1 (a)

Item 32.1:

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

- (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 1-15: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016



Applicable Federal Requirement:6 NYCRR 228-1.1 (a)

Item 1-15.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 1-15.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

§228-1.1 Applicability and Exemptions.

(a) Applicability. Except as provided for in Subdivision (b) of this Section, every owner or operator of a facility containing a coating line must comply with the provisions of this Subpart. All facilities which start-up after the effective date of this regulation must be in compliance upon start-up. All other subject facilities must be in compliance by the effective date of this regulation; or submit a schedule and plan to the department within three months of the effective date of this regulation. The schedule and plan must describe in detail how the facility will implement the applicable requirements of Subpart 228-1 of this Part, and include a compliance schedule outlining the specific dates the implementation measures will be completed. This schedule and plan must be implemented and bring the facility into compliance within nine months of the effective date of the regulation.

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

- (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 228-1.5(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 228-1.5(b) will not jeopardize air quality.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-16: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-1.3 (a)

Item 1-16.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-16.2:

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 will be determined by conducting a Method 9 opacity evaluation at a minimum frequency of once per year, while the source is in normal operating mode.

In addition to the above opacity evaluation, the permittee will conduct daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Inclement weather conditions shall be recorded for those days when observations are prohibited. This

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logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. 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.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-17: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b)

Item 1-17.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: U-00001 Emission Point: 00001
Process: 005 Emission Source: LAMN1

Regulated Contaminant(s):

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CAS No: 0NY998-00-0 VOC

Item 1-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility is required to keep monthly records of materials purchase/usage and other VOC content. The facility is required to submit to the Department upon request from NYSDEC, reports giving VOC emissions for each month and cumulative VOC emissions for the consecutive 12-month period, on a monthly basis.

Any facility required to perform the overall removal efficiency calculation set forth in Equation 2 of Subsection 228-1.5(c) of this Part, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 90 percent. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department.

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 from NYSDEC, be submitted to the Department within 90 days of receiving the request. All records required by this paragraph must be maintained at the facility for a period of five (5) years.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: VOC

Upper Permit Limit: 24 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-18: Compliance Certification

Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-1.3 (b)

Item 1-18.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:



Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: C00XD

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN1

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN2

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: P00XD

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

Item 1-18.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is required to keep monthly records of materials purchase/usage and other VOC content materials. The facility is required to submit to the Department upon request from NYSDEC, 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 from NYSDEC, be submitted to the Department. Records must be maintained at the facility for a period of five (5) years.

All records made to determine compliance with Subpart 228-2 shall be maintained for five years from the date such record is created and shall be made available to the Department within 90 days of a request.

(b) Recordkeeping

(1) Except as provided for in Paragraph (2) of this Subdivision, the owner or operator of any emission source subject to this Subpart must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request,



these records must be submitted to the department within 90 days of receiving the request. Any facility required to perform the overall removal efficiency calculation set forth in Equation 2 of Subsection 228-1.5(c) of this Part, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 90 percent. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department. All records required by this paragraph must be maintained at the facility for a period of five years.

(2) Owners and operators of emission sources not subject to this Subpart as set forth in Paragraphs 228-1.1(b)(9) or (13) of this Part, or those sources that are using coatings not subject to specific requirements of this Subpart as set forth in Paragraph 228-1.3(e)(2), or Clauses 228-1.4(b)(5)(iii)(e), 228-1.4(b)(5)(iii)(i) or 228-1.4(b)(5)(iv) of this Part, must maintain records on an as used basis. The records must include the relevant regulatory citation of each exemption and quantity of coating used. If the exemption criteria are based on VOC usage, the records must contain calculations and supplier/manufacturer material data sheets for verification of VOC usage. All records required by this Paragraph must be maintained at the facility for a period of five years.

Monitoring Frequency: MONTHLY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-19: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Item 1-19.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: C00XD
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN1
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN2
Emission Unit: U-00001	Emission Point: 00001

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Process: 005

Emission Source: P0OXD

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-19.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is required to keep monthly records of materials purchase/usage and other VOC content materials. The facility is required to submit to the Department upon request from NYSDEC, 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 from NYSDEC, be submitted to the Department. Records must be maintained at the facility for a period of five (5) years.

All records made to determine compliance with Subpart 228-2 shall be maintained for five years from the date such record is created and shall be made available to the Department within 90 days of a request.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-20: Surface Coating- Prohibitions

Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-1.3 (c)

Item 1-20.1:

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

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(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Condition 1-21: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

Item 1-21.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: COOXD
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN1
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN2
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: P00XD
Regulated Contaminant(s): CAS No: 0NY998-00-0 VOC	

Item 1-21.2:

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.

(d) Handling, storage and disposal of volatile organic compounds.

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to 6 NYCRR Part 228 must:

(1) 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;

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

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

(4) not use open containers to store or dispense surface 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;

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

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

(7) beginning January 1, 2005, clean hand held spray guns by one of the following:

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

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

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

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

All associated coating line work area(s) within the facility shall be inspected daily to determine if there are any open containers present, and that only acceptable spray gun cleaning methods were utilized. A log book shall be maintained in the operating area to record these inspections and their results. If open containers are found, shall be covered and the log book shall include the following information:

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- date and time of inspection
- items or areas observed
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-22: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-1.4 (d) (1)

Item 1-22.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 1-22.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(d) Class D Coating line

(1) Unless the appropriate emission control requirements of Section 228-1.5 of this Part have been met or a process specific RACT variance has been granted in accordance with Section 228-1.5(e) of this Part, a facility performing a Class D coating process shall not operate unless the appropriate strategies to control VOC emissions are used.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-23: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-1.5 (a)

Item 1-23.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

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

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Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN1

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN2

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: P00XD

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

Item 1-23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

§228-1.5 Requirements for controlling VOC emissions using add-on controls or coating system.

(a) Use of coatings that exceed the VOC content limits at application specified in the tables of Section 228-1.4 of this Subpart is prohibited, unless a coating system meeting the requirements of Subdivision (d) of this Section is utilized, control equipment meeting the requirements of Subdivisions (b) and (c) of this Section is installed and operated, or a process specific RACT variance is granted under Subdivision (e) of this Section.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-24: Compliance Certification

Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-1.5 (b)

Item 1-24.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: C00XD

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN1

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN2

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Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: P00XD

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

Item 1-24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

§228-1.5 Requirements for controlling VOC emissions using add-on controls or coating system.

(b) Any VOC incinerator (Regenerative Thermal Oxidizer) used as control equipment must be designed and operated to provide, at a minimum a 90 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 for coating lines subject to this Subpart to shut down the VOC incinerator from November 1st through March 31st for the purposes of natural gas conservation, provided that the department has determined that this action will not jeopardize air quality.

Parameter Monitored: VOC

Lower Permit Limit: 90 percent reduction by weight

Reference Test Method: Method 18 or 25 or 25A

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 1-25: Compliance Certification

Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-1.5 (c)

Item 1-25.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: C00XD

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN1

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN2



Emission Unit: U-00001 Emission Point: 00001
 Process: 005 Emission Source: P00XD

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

Item 1-25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

§228-1.5 Requirements for controlling VOC emissions using add-on controls or coating system.

(c) The overall removal efficiency of an air cleaning device (Regenerative Thermal Oxidizer) used as a control strategy must be determined, for every surface coating formulation, on a solids as applied basis using Equation 2 unless a 90 percent or 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 90 percent or as determined by Equation 2.

$$X \text{ 100\%} = \left[1 - \frac{(\text{VOC})_c(\text{Vn})_a}{(\text{VOC})_a(\text{Vn})_c} \right] \text{ Equation 2}$$

Where:

n is the overall removal efficiency.

(VOC)_c is the maximum permissible pounds of VOC per gallon of coating minus water and excluded compounds at application, as set forth in the tables of Section 228-1.4 of this Subpart.

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

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

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

(Vv)_c is the volumetric fraction of VOC, expressed as gallon of VOC per gallon of coating minus water and



excluded compounds, in a compliant coating expressed as:

$$\text{Equation 4} \quad (Vv)_c = \frac{(VOC)_c}{d_{voc}}$$

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

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

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

$$\text{Equation 6} \quad (Vv)_a = \frac{(VOC)_a}{d_{VOC}}$$

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-26: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-1.5 (e) (1)

Item 1-26.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 1-26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(e) Process specific RACT demonstrations.



(1) The department may allow surface coating processes to operate with a lesser degree of control than is required by this section provided that a process specific reasonably available control technology (RACT) demonstration has been made to the satisfaction of the department. Such process specific RACT demonstrations must be submitted to the administrator for approval as a revision to the State Implementation Plan and must address the technical and economic feasibility of:

(i) utilizing compliant coating(s) and/or inks;

(ii) utilizing demonstrated and proven emission control technologies which would achieve the required overall removal efficiency determined pursuant to Subdivision (c) of this Section;

(iii) utilizing demonstrated and proven emission control technologies which would achieve a level of overall removal efficiency less than the required level determined pursuant to Subdivision (c) of this Section; and

(iv) utilizing demonstrated and proven production modification methods which would result in real, documented, and enforceable reductions in the VOC emissions from the process.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-27: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-1.6 (d)

Item 1-27.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 1-27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(d) When an owner and/or operator of 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 performance test.



(1) The overall removal efficiency may be made by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment. Methods provided for in Subdivision (a) or (b) of this Section must be used.

(2) For any 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. The approved VOC CE test methods are contained in the following table. Test methods 204 through 204F (M204 - M204F) are included in Appendix M of 40 CFR part 51 (see table 1, Section 200.9 of this Title). The approved test methods for determining the efficiency of the control equipment are listed in Subdivision (e) of this Section.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-28: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-1.6 (e)

Item 1-28.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 1-28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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(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.

When the sampling and analysis methods by this condition are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

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 1/30/2014.

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

Condition 1-29: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-1.6 (f) (1)

Item 1-29.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001	Emission Point: 00001
Process: 005	Emission Source: C0OXD
Emission Unit: U-00001	Emission Point: 00001
Process: 005	Emission Source: LAMN1
Emission Unit: U-00001	Emission Point: 00001
Process: 005	Emission Source: LAMN2
Emission Unit: U-00001	Emission Point: 00001
Process: 005	Emission Source: P0OXD

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

Item 1-29.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

(f) If an air cleaning device (Regenerative Thermal

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Oxidizer) is used, continuous monitors for the following parameters must be installed, periodically calibrated, and operated when the associated control equipment is operating:

- (1) exhaust gas temperature of all incinerators; and
- (4) any other continuous monitoring or recording device required by the department.

The facility is to continuously monitor the temperature of the combustion chamber of the Regenerative Thermal Oxidizer (RTO), which should be maintained between 1500 and 1600 degrees Fahrenheit.

When the temperatures of the combustion chamber falls outside the approved performance test temperature range (1500 and 1600 degrees Fahrenheit); immediate action must be taken to restore control equipment to its proper operating temperature range.

Parameter Monitored: TEMPERATURE
 Lower Permit Limit: 1500 degrees Fahrenheit
 Upper Permit Limit: 1600 degrees Fahrenheit
 Monitoring Frequency: CONTINUOUS
 Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2014.
 Subsequent reports are due every 6 calendar month(s).

Condition 1-30: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-1.6 (f) (2)

Item 1-30.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: C0OXD
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN1
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN2
Emission Unit: U-00001	Emission Point: 00001



Process: 005

Emission Source: P0OXD

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-30.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

(f) If an air cleaning device (Regenerative Thermal Oxidizer) is used, continuous monitors for the following parameters must be installed, periodically calibrated, and operated when the associated control equipment is operating:

(1) exhaust gas temperature of all incinerators;
and

(4) any other continuous monitoring or recording device required by the department.

The facility is to continuously monitor the temperature of the combustion chamber of the Regenerative Thermal Oxidizer (RTO), which should not fall at any time below 1500 degrees Fahrenheit.

When the temperatures of the combustion chamber falls below the approved performance test temperature (1500 degrees Fahrenheit); immediate action must be taken to restore control equipment to its proper operating temperature.

Parameter Monitored: TEMPERATURE RISE, LENGTH OF EXCURSION

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 1/30/2014.

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

Condition 1-31: Compliance Certification

Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-2.5 (c)

Item 1-31.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:



Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: C0OXD
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN1
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN2
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: P0OXD

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

Item 1-31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

§228-2.5 Administrative requirements:

(a) Each owner or operator of an emission source where a product subject to a VOC content limit in Subdivision 228-2.4(a) of this Subpart is used shall maintain records demonstrating compliance with the VOC content limits of this Subpart, including, but not limited to, the following information:

(1) a list of each commercial and industrial adhesive, sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at the facility;

(2) identification of each product by product name and description;

(3) the VOC content of each product as supplied;

(4) the mix ratio of any catalysts, reducers or other components used;

(5) the final VOC content or vapor pressure, as applied; and

(6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used at the facility.

(b) Any owner or operator of an emission source that



complies with the VOC content limits in Subdivision 228-2.4(a) of this Subpart through the use of add-on air pollution control equipment shall record the key operating parameters for the control equipment, including but not limited to, the following information:

- (1) the volume used per day of each adhesive, sealant, adhesive primer, sealant primer or solvent listed in table 1 of Subdivision 228-2.4(a) of this Subpart;
 - (2) on a daily basis, the combustion temperature, inlet and exhaust gas temperatures and control device efficiency, as appropriate, pursuant to Subdivision 228-2.4(c) of this Subpart;
 - (3) daily hours of operation; and
 - (4) all maintenance performed including the date and type of maintenance.
- (c) All records made to determine compliance with this Subpart shall be maintained for five years from the date such record is created and shall be made available to the department within 90 days of a request.
- (d) For adhesives, sealants, adhesive primers and sealant primers subject to the laboratory testing exemption pursuant to Paragraph 228-2.2(a)(1) of this Subpart, the person conducting the testing shall make and maintain records of all such materials used, including, but not limited to, the product name, the product category of the material or type of application and the VOC content of each material.

Monitoring Frequency: MONTHLY
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 3 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 234.4 (b)

Item 35.1:
The Compliance Certification activity will be performed for the Facility.

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

Item 35.2:

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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

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2011.

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

Condition 1-32: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:40CFR 63, Subpart KK

Item 1-32.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: C0OXD

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Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN1

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN2

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: P00XD

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

Item 1-32.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility will demonstrate that the 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 each 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 emission calculations of each individual HAP and Total HAPs from all activities at the facility. Records must be maintained at the facility for a period of five (5) years.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 25 tons per year

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 1/30/2014.

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

**Condition 36: Applicability of 40CFR 63 Subpart KK
Effective between the dates of 03/15/2011 and 03/14/2016**

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

Item 36.1:

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 37: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 37.1:

The Compliance Certification activity will be performed for the Facility.

Item 37.2:

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 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

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Averaging Method: CALENDAR MONTH TOTAL
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 38.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 38.2:

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
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 39: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 39.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 39.2:

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 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

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

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

Condition 40: Emission Point Definition By Emission Unit
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 40.1(From Mod 1):

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

Emission Unit: U-00001

Emission Point: 00001

Height (ft.): 45

Diameter (in.): 54

NYTMN (km.): 4501.55

NYTME (km.): 595.15

Building: MAIN

Item 40.2(From Mod 0):

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

Condition 41: Process Definition By Emission Unit
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 41.1(From Mod 1):

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

Emission Unit: U-00001

Process: 005

Source Classification Code: 4-05-003-11

Process Description:

Process 005 is the lamination process of the two (2) laminators (Emission Sources LAMN1 & LAMN2), in which their emissions vent through a regenerative thermal oxidizer (Emission Source/Control P0OXD/C0OXD). The two laminators' corresponding emission point is Emission Point 00001, and their corresponding Emission Unit is U-00001. The two laminators include the new Nordmeccanica Duplex Combi linear laminator, Model 1500, 59" (Emission Source LAMN1) and the Nordmeccanica Triplex Combi Verticale

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Laminator, Model L1500 (Emission Source LAMN2), their corresponding emission point is Emission point 00001, and their corresponding emission unit is Emission Unit U-00001.

Emission Source/Control: C00XD - Control
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: LAMN1 - Process
Design Capacity: 1,476 feet per minute

Emission Source/Control: LAMN2 - Process
Design Capacity: 20,000 cubic feet per minute

Emission Source/Control: P00XD - Process
Design Capacity: 40,000 cubic feet per minute

Item 41.2(From Mod 0):

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 41.3(From Mod 0):

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 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 41.4(From Mod 0):

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. 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 41.5(From Mod 0):

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 the three flexographic printing presses (Emission Sources FLX05, FLX06 & FLX07) and emissions from the two (2) laminators (Emission Sources LAMNT & LAMN2) 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,
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 41.6(From Mod 0):

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 (Emission Source RENZM). 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

Condition 50: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 234.3 (a) (1) (i)

Item 50.1:

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: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

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.

Parameter Monitored: VOC
Lower Permit Limit: 60 percent by weight

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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 51: Compliance dates for new and reconstructed sources
Effective between the dates of 03/15/2011 and 03/14/2016**

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

Item 51.1:

This Condition applies to Emission Unit: U-00001

Item 51.2:

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 52: Monitoring of capture system and control device parameters
Effective between the dates of 03/15/2011 and 03/14/2016**

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

Item 52.1:

This Condition applies to Emission Unit: U-00001

Item 52.2:

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).

**Condition 53: Compliance date for an existing source
Effective between the dates of 03/15/2011 and 03/14/2016**

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

Item 53.1:

This Condition applies to Emission Unit: U-00001



Item 53.2: The compliance date for an owner or operator of an existing affected source subject to 40CFR63 Subpart KK is May 30, 1999.

Condition 54: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 54.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 54.2:
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.
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

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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 55: Calibration of temperature monitoring equipment
Effective between the dates of 03/15/2011 and 03/14/2016**

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

Item 55.1:

This Condition applies to Emission Unit: U-00001

Item 55.2:

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 56: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016**

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

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 56.2:

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

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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 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 57: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 57.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00001

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

Item 57.2:
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.

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The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 58: Continuous parameter monitoring for capture efficiency
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 58.1:

This Condition applies to Emission Unit: U-00001

Item 58.2:

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

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

Condition 59: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 59.2:

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 7/30/2011.

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

Condition 60: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 60.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 60.2:

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

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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 61: Notification of performance test
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 61.1:

This Condition applies to Emission Unit: U-00001

Item 61.2:

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

Condition 62: Notification of compliance status
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 62.1:

This Condition applies to Emission Unit: U-00001

Item 62.2:

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 64: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 234.4 (c)

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Emission Point: 00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

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Item 64.2:

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 6 NYCRR 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 7/30/2011.

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

**Condition 65: Control requirements for product and packaging rotogravure
or wide-web flexographic presses**

Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 65.1:

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

Item 65.2:

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 66: Compliance Certification

Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 66.1:

The Compliance Certification activity will be performed for:



Emission Unit: U-00001 Emission Point: 00001

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

Item 66.2:

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 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

**Condition 67: Compliance with capture and control requirements
Effective between the dates of 03/15/2011 and 03/14/2016**

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

Item 67.1:

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

Item 67.2:

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

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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 68: Procedure for determining capture efficiency
Effective between the dates of 03/15/2011 and 03/14/2016**

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

Item 68.1:

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

Item 68.2:

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 1-33: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016**

Applicable Federal Requirement:6 NYCRR 228-2.5 (a)

Item 1-33.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: COOXD
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN1
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN2
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: P0OXD

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

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Item 1-33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities using products subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) shall maintain records demonstrating compliance with the VOC content limits, including, but not limited to, the following information:

- (1) a list of each commercial and industrial adhesive, sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at the facility;
- (2) identification of each product by product name and description;
- (3) the VOC content of each product as supplied;
- (4) the mix ratio of any catalysts, reducers or other components used;
- (5) the final VOC content or vapor pressure, as applied; and
- (6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used at the facility.

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 1/30/2014.

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

Condition 1-34: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-2.5 (c)

Item 1-34.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: C00XD

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Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN1

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN2

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: P00XD

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

Item 1-34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records made to determine compliance with Subpart 228-2 shall be maintained for five years from the date such record is created and shall be made available to the Department within 90 days of a request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-35: Compliance Certification

Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Item 1-35.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: C00XD

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN1

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN2

Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: P00XD

Item 1-35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-36: Surface Coating - Handling, storage and disposal
Effective between the dates of 11/05/2013 and 03/14/2016**

Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

Item 1-36.1:

This Condition applies to:

Emission Unit: U00001
Process: 005

Emission Point: 00001
Emission Source: COOXD

Emission Unit: U00001
Process: 005

Emission Point: 00001
Emission Source: LAMN2

Emission Unit: U00001
Process: 005

Emission Point: 00001
Emission Source: P00XD

New York State Department of Environmental Conservation

Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Item 1-36.1:

This Condition applies to Emission Unit: U-00001 Emission Point: 00001
Process: 005 Emission Source:
LAMN1

Item 1-36.2.3:

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

- (1) 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;
- (2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (4) not use open containers to store or dispense surface 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;
- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
 - (i) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Condition 1-37: Surface coating access for sampling
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 228-1.6 (c)

Item 1-37.1:

This Condition applies to:

Emission Unit: U00001 Emission Point: 00001

Air Pollution Control Permit Conditions



when measuring VOC contents of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

(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.

When the sampling and analysis methods by this condition are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

Condition 1-39: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-2.5 (b)

Item 1-39.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

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

Emission Unit: U-00001 Emission Point: 00001
Process: 005 Emission Source: LAMN1

Emission Unit: U-00001 Emission Point: 00001
Process: 005 Emission Source: LAMN2

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

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

Item 1-39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Permit ID: 2-6105-00149/00006

Facility DEC ID: 2610500149



Monitoring Description:

Facilities that comply with the VOC content limits in 6 NYCRR Part 228-2.4(a) through the use of add-on air pollution control equipment shall record the key operating parameters for the control equipment, including but not limited to, the following information:

- (1) the volume used per day of each adhesive, sealant, adhesive primer, sealant primer or solvent listed in Table 1 of 6 NYCRR Part 228-2.4(a);
- (2) on a daily basis, the combustion temperature, inlet and exhaust gas temperatures and control device efficiency, as appropriate, pursuant to 6 NYCRR Part 228-2.4(c);
- (3) daily hours of operation; and
- (4) all maintenance performed including the date and type of maintenance.

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 1/30/2014.

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

Condition 1-40: Compliance Certification
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-2.5 (d)

Item 1-40.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: COOXD
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN1
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: LAMN2
Emission Unit: U-00001 Process: 005	Emission Point: 00001 Emission Source: POOXD

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 1-40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities testing or evaluating adhesives, sealants, adhesive primers and sealant primers subject to the laboratory testing exemption in 6 NYCRR Part 228-2.2(a)(1), shall make and maintain records of all such materials used, including, but not limited to, the product name, the product category of the material or type of application and the VOC content of each material.

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 1/30/2014.

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

Condition 69: Capping Monitoring Condition
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 69.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 231-2

Item 69.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 69.3:

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

Item 69.4:

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

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Item 69.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 69.6:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Emission Point: 00001

Process: 005

Emission Source: LAMN2

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 69.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility is required to keep monthly records of materials purchase/usage and other VOC content. The facility is required to 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 (5) years.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: VOC

Upper Permit Limit: 24 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2011.

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

Condition 70: Compliance Certification

Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 228-1.5

Item 70.1:

The Compliance Certification activity will be performed for:

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Facility DEC ID: 2610500149



Emission Unit: U-00001
Process: 005

Emission Point: 00001
Emission Source: LAMN2

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

Item 70.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility is required to keep monthly records of materials purchase/usage and other VOC content. The facility is required to 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 (5) years.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: VOC

Upper Permit Limit: 24 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2011.

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

Condition 83: Compliance Certification

Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 234.4 (b)

Item 83.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001
Process: 050

Emission Point: 00001
Emission Source: FLX05

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

Item 83.2:

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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 4/30/2011.

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

Condition 84: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 234.6

Item 84.1:

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 84.2:

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 7/30/2011.

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

Condition 85: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

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

Item 85.1:

The Compliance Certification activity will be performed for:

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Emission Unit: U-00001
Process: 050

Emission Point: 00001
Emission Source: FLX05

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

Item 85.2:

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 7/30/2011.

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

Condition 86: Compliance Certification

Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 234.4 (b)

Item 86.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001
Process: 060

Emission Point: 00001
Emission Source: FLX06

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

Item 86.2:

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 4/30/2011.



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

Condition 87: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 234.6

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 7/30/2011.

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

Condition 88: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

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

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: 0NY100-00-0 TOTAL HAP

Item 88.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Record measurements of control device and capture system

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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 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 89: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 234.4 (b)

Item 89.1:

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 89.2:

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 4/30/2011.
Subsequent reports are due every 3 calendar month(s).

Condition 90: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 234.6

Item 90.1:

The Compliance Certification activity will be performed for:

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

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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 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 7/30/2011.

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

Condition 91: Compliance Certification

Effective between the dates of 03/15/2011 and 03/14/2016

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

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: 0NY100-00-0 TOTAL HAP

Item 91.2:

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 7/30/2011.

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

Condition 92: Compliance Certification

Effective between the dates of 03/15/2011 and 03/14/2016



Applicable Federal Requirement:6 NYCRR 234.4 (c)

Item 92.1:

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 92.2:

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

Parameter Monitored: TEMPERATURE

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 7/30/2011.

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

Condition 93: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 234.3 (a) (1) (ii) ('d')

Item 93.1:

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 93.2:

Compliance Certification shall include the following monitoring:

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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
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 94: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement: 6 NYCRR 234.4 (c)

Item 94.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001
Process: OXD

Emission Point: 00001
Emission Source: C0OXD

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Permit ID: 2-6105-00149/00006

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

Item 94.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

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.

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 400 RTO

Parameter Monitored: TEMPERATURE

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 7/30/2011.

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

Condition 95: Compliance Certification

Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 226.2

Item 95.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00002

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

Item 95.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A person conducting solvent metal cleaning must:

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- (a) store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere;
- (b) maintain equipment to minimize leaks and fugitive emissions;
- (c) display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs;
- (d) keep the degreaser cover closed except when parts are being placed into or being removed from the degreaser, the cover needs to be open in order to add or remove solvent from the degreaser, no solvent is in the degreaser, or manually cleaning metal parts in a cold cleaning degreaser;
- (e) create and retain a record of solvent consumption for five years. This record must be made available to the department upon request;
- (f) not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser; and
- (g) if using a cold cleaning degreaser that is subject to section 226.3(a)(4) of this Part, retain a record of the following three items for five years and provide these records to the department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a material safety data sheet (MSDS), or other appropriate documentation acceptable to the department may be used to comply with this requirement:
 - (1) the name and address of the solvent supplier;
 - (2) the type of solvent including the product or vendor identification number; and
 - (3) the vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

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 7/30/2011.

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

Condition 96: Compliance Certification



Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 226.3 (a)

Item 96.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00002

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

Item 96.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Except as otherwise permitted by the department pursuant to section 226.5 of this Part, the following types of control equipment must be used by a person conducting solvent metal cleaning:

(a) Cold cleaning degreasing when the internal volume of the machine is greater than two gallons.

(1) A cover which can be operated easily.

(2) An internal drainage facility (under cover), if practical.

(3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. Remote reservoir degreasers are exempt from this requirement.

(4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20°C. Prior to January 1, 2004, compliance with this requirement is not mandatory if compliant solvents are not readily available. On or after January 1, 2004, the person conducting solvent metal cleaning covered by this subdivision must use compliant solvents or have submitted a process specific RACT demonstration pursuant to section 226.5 of this Part. This paragraph does not apply to degreasers:

(i) used in special and extreme solvent metal cleaning;

(ii) for which the owner or operator has received department approval of a demonstration that compliance with the requirement of a solvent with a vapor pressure of

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1.0 mm Hg, or less, at 20°C will result in unsafe operating conditions; or

(iii) that are located in a permanent total enclosure having control equipment that is designed and operated with an overall VOC removal efficiency of 90 percent or greater.

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 7/30/2011.

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

Condition 97: Compliance Certification
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable Federal Requirement:6 NYCRR 226.4 (a)

Item 97.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 97.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Except as otherwise allowed by the department pursuant to section 226.5 of this Part, the following operating practices are required by a person conducting solvent metal cleaning:

(a) Cold cleaning degreasing. Clean parts shall be drained 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 7/30/2011.

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 98: Contaminant List
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable State Requirement:ECL 19-0301

Item 98.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0
Name: TOTAL HAP



CAS No: 0NY998-00-0

Name: VOC

Condition 1-41: Malfunctions and start-up/shutdown activities
Effective between the dates of 11/05/2013 and 03/14/2016

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-41.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, 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 department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 99: Unavoidable noncompliance and violations
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable State Requirement:6 NYCRR 201-1.4

Item 99.1:

At the discretion of the commissioner a violation of any applicable emission standard for



necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

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

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

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

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air 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 100: Visible Emissions Limited
Effective between the dates of 03/15/2011 and 03/14/2016

Applicable State Requirement:6 NYCRR 211.2

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Item 100.1:

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.

