



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 2-6301-00093/00008  
Mod 0 Effective Date: 01/12/2000 Expiration Date: 01/11/2005  
Mod 1 Effective Date: 05/26/2004 Expiration Date: 01/11/2005

Permit Issued To: STANDARD FOLDING CARTONS INC  
85TH ST & 24 AVE  
JACKSON HEIGHTS, NY 11370

Contact: MICHAEL SAWKA  
STANDARD FOLDING CARTONS  
85-14 24 AVENUE  
EAST ELMHURST, NY 11370

Facility: STD FOLDING CARTON INC-85 ST & 24 AVE  
85TH ST & 24 AVE|85-14 24TH AVENUE  
JACKSON HEIGHTS, NY 11370

Contact: MICHAEL SAWKA  
STANDARD FOLDING CARTONS  
85-14 24 AVENUE  
EAST ELMHURST, NY 11370

Description:  
THIS IS AN INDUSTRIAL FACILITY WHERE PRINTING IS DONE WITH INKS THAT CONTAIN VOLATILE ORGANIC COMPOUNDS (VOC). THE ANNUAL VOC EMISSIONS EXCEED 25 TONS PER YEAR, WHICH MAKE STANDARD FOLDING CARTON INC. A MAJOR FACILITY FOR VOC EMISSIONS.

THIS IS A SIGNIFICANT MODIFICATION TO A TITLE V PERMIT APPLICATION FOR AN EXISTING GRAPHIC ART PRINTING FACILITY. TWO (2) EXISTING MIEHLE OFFSET LITHOGRAPHIC PRESSES WILL BE REPLACED WITH A NEW 7 COLOR MITSUBISHI PRESS AND THE EXISTING MITSUBISHI PRESS WILL BE MODIFIED TO UTILIZE UV CURABLE INKS. THE NEW 7 COLOR MITSUBISHI PRESS USES FOUNTAIN SOLUTION, OIL-BASED INKS, WATER-BASED COATINGS AND MISCELLANEOUS SOLVENT FORMULATIONS. ALL FOUNTAIN SOLUTIONS WILL BE REQUIRED TO CONTAIN LESS THAN 10% VOCs BY WEIGHT.

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

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

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



**Notification of Other State Permittee Obligations**

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

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

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

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

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

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

**Facility Level**

Submission of Applications for Permit Modification or Renewal-REGION 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 1-1: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 1-1.1:**

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

**Item 1-1.2:**

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

**Item 1-1.3:**

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



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

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

**Expired by Mod No: 1**

**Item 3.1:**

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

**Item 3.2:**

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

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

**Item 1-2.1:**

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

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

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

**Expired by Mod No: 1**

**Item 4.1:**

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

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



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

**Condition 5: Submission of Applications for Permit Modification or Renewal-REGION 2 HEADQUARTERS**  
**Applicable State Requirement: 6NYCRR 621.5(a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 2 Headquarters  
Division of Environmental Permits  
1 Hunters Point Plaza, 4740 21st Street  
Long Island City, NY 11101-5407  
(718) 482-4997



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

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

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Facility: STD FOLDING CARTON INC-85 ST & 24 AVE  
85TH ST & 24 AVE|85-14 24TH AVENUE  
JACKSON HEIGHTS, NY 11370

Authorized Activity By Standard Industrial Classification Code:  
2657 - FOLDING PAPERBOARD BOXES  
2752 - COMMERCIAL PRINTING



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 24 6NYCRR 201-6: Emission Unit Definition
- 1-1 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 1-2 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 1-3 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 1-4 6NYCRR 201-6.5(e): Compliance Certification
- 1-5 6NYCRR 201-6.5(g): Non Applicable requirements
- 1-6 6NYCRR 202-1.1: Required Emissions Tests - Facility Level
- 27 6NYCRR 202-2.1: Compliance Certification
- 28 6NYCRR 202-2.5: Recordkeeping requirements
- 1-7 6NYCRR 234.1(g): Facilities subject to Part 234 remain subject even if emissions go below applicability threshold
- 1-8 6NYCRR 234.4(b)(3): Compliance Certification
- 32 6NYCRR 234.6: Handling, storage, and disposal of volatile organic compounds
- 1-9 40CFR 68: Accidental release provisions.
- 1-10 40CFR 82, Subpart F: Recycling and Emissions Reduction

**Emission Unit Level**

- 34 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 35 6NYCRR 201-6: Process Definition By Emission Unit

**EU=U-PRESS**

- 1-11 6NYCRR 234.3(e): control requirement
- 39 6NYCRR 234.4(b)(2): control requirement
- 40 6NYCRR 234.4(b)(4): sampling
- 41 6NYCRR 234.5(a): prohibition of sale or specification
- 42 6NYCRR 234.5(b): VOC content

**EU=U-PRESS,Proc=002**

- 1-12 6NYCRR 234.4(b)(3): Compliance Certification

**EU=U-PRESS,Proc=002,ES=00025**

- 1-13 6NYCRR 234.3(b)(2): Compliance Certification

**EU=U-PRESS,Proc=002,ES=00026**

- 1-14 6NYCRR 234.3(b)(2): Compliance Certification

**EU=U-PRESS,EP=000M5**

- 45 6NYCRR 212.10(c)(4)(ii): Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1-15 ECL 19-0301: Contaminant List



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1-16 6NYCRR 201-1.4: Unavoidable noncompliance and violations

1-17 6NYCRR 201-7: Facility Permissible Emissions

48 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

**EU=U-PRESS**

\*1-18 6NYCRR 201-7: Capping Monitoring Condition

\*1-19 6NYCRR 201-7: Capping Monitoring Condition

NOTE: \* preceding the condition number indicates capping.LITHOGRAPH

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**FEDERALLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

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

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

Any person who owns or operates an air contamination

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

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

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

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

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

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

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

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

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

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

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

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

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

**Item F: Recycling and Salvage - 6NYCRR Part 201-1.7**

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

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

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

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

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

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

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

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requirements, regulations, or law.

**Item J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)**

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

**Item K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**

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

**Item L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**

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

**Item M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**

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

**Item N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission**

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**Requirements - 6 NYCRR Part 201-6.5(a)(3)**

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

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

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

**Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)**

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

**Item Q: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**

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

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

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

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

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

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

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

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

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

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

**Item T: Severability - 6 NYCRR Part 201-6.5(a)(9)**

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

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

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

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

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

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

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

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

**Item W: Permit Shield - 6 NYCRR Part 201-6.5(g)**

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

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

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Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item X: Reopening for Cause - 6 NYCRR Part 201-6.5(i)**

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

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

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

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

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

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

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

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a shorter time period in the case of an emergency.

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

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

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

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

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

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

**Item BB: Permit Exclusion - ECL 19-0305**

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

**FEDERAL APPLICABLE REQUIREMENTS**

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

**Condition 24: Emission Unit Definition**

**Effective between the dates of 01/12/2000 and 01/11/2005**

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

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

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

Emission Unit: U-COMP1

Emission Unit Description:

SCALES SGS 1250 NATURAL GAS ENGINE DRIVEN AIR COMPRESSOR WITH A CATERPILLAR G3406 SITA HCR 90 ENGINE AND A MIRATECH EQUINOX EQ-300S-5F CATALYTIC CONVERTOR WITH A EQUINOX 1B 300 FUEL AIR RATION CONTROLLER. THE CAPACITY OF THE ENGINE IS 250 BRAKE HORSEPOWER.

Building(s): M1

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

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

Emission Unit: U-PRESS

Emission Unit Description:

THE U-PRESS EMISSION UNIT IS COMPRISED OF TWO LITHOGRAPHIC ART PRINTING PRESSES AND ONE (1) HOT MELT GLUE POT. TWO (2) OF THESE THREE (3) EMISSION SOURCES ARE EXISTING SOURCES INCLUDING THE 7 COLOR MITSUBISHI PRESS MODEL 6F (S/N 005) (EMISSION SOURCE 00025) AND THE HOT MELT GLUE POT (EMISSION SOURCE PT43A). THE

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REMAINING EMISSION SOURCE (ID # 00026) IS A NEW 7 COLOR MITSUBISHI PRESS MODEL 6H (S/N 019) CONSTRUCTED IN MARCH 2001 AND IT REPLACES 2 EXISTING (NOW REMOVED) MIEHLE PRESSES.

THE EXISTING 7 COLOR MITSUBISHI PRESS MODEL 6F(S/N 005), WHICH STARTED OPERATION ON 3/22/98, WAS LISTED IN THE ORIGINAL TITLE V PERMIT. THE SOURCE PROJECT INVOLVES A MODIFICATION OF THIS EXISTING PRESS TO ACCOMMODATE UV INKS AND UV COATINGS IN ADDITION TO THE FOUNTAIN SOLUTION, OIL-BASED INKS, WATER-BASED COATINGS, AND MISCELLANEOUS SOLVENTS FORMULATIONS. THE UV EQUIPMENT WAS INSTALLED ON THIS PRESS BETWEEN 3/1/01 AND 3/22/01. THE EQUIPMENT IS READY TO OPERATE AND IS BEING TESTED.

THE NEW 7-COLOR MITSUBISHI PRESS USES FOUNTAIN SOLUTION, OIL-BASED INKS, WATER-BASED COATINGS, AND MISCELLANEOUS SOLVENTS FORMULATIONS. ALL FOUNTAIN SOLUTIONS WILL BE REQUIRED TO CONTAIN LESS THAN 10% VOCs, BY WEIGHT.

THE EXISTING HOT MELT GLUE POT (EMISSION SOURCE PT43A) WAS LISTED IN THE ORIGINAL TITLE V PERMIT. NO MODIFICATIONS ARE PROPOSED FOR THIS UNIT.

THE NEW 7 COLOR MITSUBISHI PRESS MODEL 6H (S/N 019) REPLACES TWO (2) EXISTING MIEHLE PRESSES WHICH ARE LISTED IN THE ORIGINAL TITLE V PERMIT. THE TWO (2) MIEHLE PRESSES WERE ALLOWED TO APPLY FOUNTAIN SOLUTIONS UP TO 15% VOCs, BY WEIGHT. THE NEW 7 COLOR MITSUBISHI PRESS WILL BE RESTRICTED TO PROCESSING FOUNTAIN SOLUTIONS WITH LESS THAN 10% VOCs, BY WEIGHT. THIS NEW PRESS WAS DELIVERED ON 12/16/00 WITH INSTALLATION BEGINNING ON 01/02/01. TESTING BEGAN ON 02/12/01 AND BECAME READY FOR PRODUCTION ON 03/01/01.

BOTH PRESSES USE OIL-BASED INKS AND WATER BASED COATINGS AS WELL AS MISCELLANEOUS SOLVENTS.



Building(s):      M1

**Condition 1-1: Recordkeeping and reporting of compliance monitoring**  
**Effective between the dates of 05/26/2004 and 01/11/2005**

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

**Item 1-1.1:**

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

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

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

**Condition 1-2: Monitoring, Related Recordkeeping, and Reporting**  
**Requirements.**  
**Effective between the dates of 05/26/2004 and 01/11/2005**

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

**Item 1-2.1:**

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

**Condition 1-3: Compliance Certification**  
**Effective between the dates of 05/26/2004 and 01/11/2005**

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

**Item 1-3.1:**

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The Compliance Certification activity will be performed for the Facility.

**Item 1-3.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

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

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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

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

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

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

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

**Condition 1-4: Compliance Certification**

**Effective between the dates of 05/26/2004 and 01/11/2005**

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

**Item 1-4.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-4.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to

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determine the compliance status of the facility as specified in any special permit terms or conditions; and  
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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

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



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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 1/30/2005.  
Subsequent reports are due on the same day each year

**Condition 1-5: Non Applicable requirements**  
**Effective between the dates of 05/26/2004 and 01/11/2005**

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

**Item 1-5.1:**

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) 6NYCRR 227-2.4(f)(2)

Emission Unit: UCOMP1

Reason: EVEN THOUGH THE ENGINE HAS A 250 HORSEPOWER RATING (GREATER THAN THE 225 HORSEPOWER LIMIT REQUIRED FOR PART 227-2.4(f) APPLICABILITY), THE ENGINE IS NOT SUBJECT TO PART 227-2 OR NOX RACT.

THE FACILITY'S NOX EMISSIONS ARE LESS THAN 25 TONS PER YEAR. SINCE STANDARD FOLDING IS NOT A MAJOR NOX EMITTER, NOX RACT DOES NOT APPLY.

THE OWNER IS REQUIRED TO SUBMIT TO DEC WITH THE ANNUAL EMISSION STATEMENTS REQUIRED UNDER PART 202-2 REPORTS OF THE FACILITY'S NOX EMISSIONS. THE NOX EMISSION COMPUTATIONS SHOULD BE BASED ON THE FUEL FIRED AT THE FACILITY BY ALL COMBUSTION SOURCES AND ON THE AP-42 MANUAL EMISSION FACTORS.

**Condition 1-6: Required Emissions Tests - Facility Level**  
**Effective between the dates of 05/26/2004 and 01/11/2005**

**Applicable Federal Requirement: 6NYCRR 202-1.1**

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**Item 1-6.1:**

An acceptable report of measured emissions shall be submitted, as required by the commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation.

**Condition 27: Compliance Certification**

Effective between the dates of 01/12/2000 and 01/11/2005

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

**Item 27.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 27.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

**Condition 28: Recordkeeping requirements**

Effective between the dates of 01/12/2000 and 01/11/2005

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

**Item 28.1:**

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

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

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

**Condition 1-7: Facilities subject to Part 234 remain subject even if emissions go below applicability threshold**

Effective between the dates of 05/26/2004 and 01/11/2005

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



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**Replaces Condition(s) 36**

**Item 1-7.1:**

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

**Condition 1-8: Compliance Certification**

**Effective between the dates of 05/26/2004 and 01/11/2005**

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

**Item 1-8.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-8.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

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

**Condition 32: Handling, storage, and disposal of volatile organic compounds**  
**Effective between the dates of 01/12/2000 and 01/11/2005**

**Applicable Federal Requirement: 6NYCRR 234.6**

**Item 32.1:**

No owner or operator of a facility subject to 6NYCRR Part 234 shall:

- (a) use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or ink/coating removal;
- (b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;
- (c) use open containers to store or dispose of inks and/or surface coatings; or
- (d) use open containers to store or dispense inks and/or surface coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

**Condition 1-9: Accidental release provisions.**  
**Effective between the dates of 05/26/2004 and 01/11/2005**

**Applicable Federal Requirement: 40CFR 68**

**Item 1-9.1:**

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:

USEPA Region 2



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

**Condition 1-10: Recycling and Emissions Reduction**  
**Effective between the dates of 05/26/2004 and 01/11/2005**

**Applicable Federal Requirement: 40CFR 82, Subpart F**

**Replaces Condition(s) 33**

**Item 1-10.1:**

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

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

**Condition 34: Emission Point Definition By Emission Unit**  
**Effective between the dates of 01/12/2000 and 01/11/2005**

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

**Item 34.1(From Mod 1):**

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

Emission Unit: U-PRESS

Emission Point: 000M1  
Height (ft.): 13                      Diameter (in.): 36  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

Emission Point: 000M2  
Height (ft.): 13                      Diameter (in.): 36  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

Emission Point: 000M3  
Height (ft.): 13                      Diameter (in.): 36  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

Emission Point: 000M4  
Height (ft.): 13                      Diameter (in.): 36  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

Emission Point: 000M5  
Height (ft.): 28                      Length (in.): 14                      Width (in.): 17  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

Emission Point: 000M7



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Height (ft.): 22                      Diameter (in.): 18  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

Emission Point: 000M8  
Height (ft.): 13                      Diameter (in.): 36  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

Emission Point: 000M9  
Height (ft.): 22                      Diameter (in.): 18  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

Emission Point: 00M10  
Height (ft.): 22                      Diameter (in.): 20  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

**Item 34.2(From Mod 0):**

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

Emission Unit: U-COMP1

Emission Point: E0001  
Height (ft.): 30                      Diameter (in.): 8  
Building: M1

**Item 34.3(From Mod 0):**

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

Emission Unit: U-PRESS

Emission Point: 000M6  
Height (ft.): 25                      Length (in.): 14                      Width (in.): 17  
Building: M1

Emission Point: E00M1  
Height (ft.): 13                      Diameter (in.): 36  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

Emission Point: E00M2  
Height (ft.): 13                      Diameter (in.): 36  
NYTMN (km.): 4513.1              NYTME (km.): 594.2              Building: M1

**Condition 35: Process Definition By Emission Unit**  
**Effective between the dates of 01/12/2000 and 01/11/2005**

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

**Item 35.1(From Mod 1):**

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

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Emission Unit: U-COMP1

Process: 001

Source Classification Code: 2-02-002-02

Process Description:

A natural gas engine driven air compressor with a catalytic converter and a fuel-air ratio controller.

Emission Source/Control: S1250 - Combustion

**Item 35.2(From Mod 1):**

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

Emission Unit: U-PRESS

Process: 002

Source Classification Code: 4-05-004-01

Process Description:

TWO (2) OFFSET LITHOGRAPHIC ART PRINTING PRESSES USING FOUNTAIN SOLUTION CONTAINING <10% BY WEIGHT VOCS. THE PRESSES ARE/WILL BE LOCATED WITHIN THE MAIN BUILDING ON THE SHOP FLOOR. THERE IS ONE HOT MELT GLUE POT WITH A SEPARATE EXHAUST SYSTEM. THE PRESSES AND THE INK MIXING AREA WITH THE GLUE POT ARE LOCATED IN THE MAIN BUILDING ON THE SHOP FLOOR AND THE BUILDING IS CONTINUOUSLY VENTED THROUGH FIVE WALL FANS.

ONE OF THE PRESSES USES UV CURED INKS AND OIL-BASED INKS AND WATER BASED COATINGS WHILE THE OTHER PRESS USES OIL-BASED INKS AND WATER BASED COATING.

THE EXISTING 7 COLOR MITSUBISHI PRESS MODEL 6F(S/N 005), WHICH STARTED OPERATION ON 3/22/98, WAS LISTED IN THE ORIGINAL TITLE V PERMIT. THE SOURCE PROJECT INVOLVES A MODIFICATION OF THIS EXISTING PRESS TO ACCOMMODATE UV INKS AND UV COATINGS IN ADDITION TO THE ORIGINAL FOUNTAIN SOLUTION, OIL BASED INKS, WATER BASED COATINGS AND MISCELLANEOUS SOLVENTS FORMULATIONS. THE UV EQUIPMENT WAS INSTALLED ON THIS PRESS BETWEEN 3/1/01 AND 3/22/01. THE EQUIPMENT IS READY TO OPERATE AND IS BEING TESTED.

THE EXISTING HOT MELT GLUE POT (EMISSION SOURCE PT43A) WAS LISTED IN THE ORIGINAL



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TITLE V PERMIT. NO MODIFICATIONS ARE  
PROPOSED FOR THIS UNIT.

Emission Source/Control: 00025 - Process

Emission Source/Control: 00026 - Process

Emission Source/Control: PT43A - Process

**Condition 1-11: control requirement**

**Effective between the dates of 05/26/2004 and 01/11/2005**

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

**Item 1-11.1:**

This Condition applies to Emission Unit: U-PRESS

**Item 1-11.2:**

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

**Condition 39: control requirement**

**Effective between the dates of 01/12/2000 and 01/11/2005**

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

**Item 39.1:**

This Condition applies to Emission Unit: U-PRESS

**Item 39.2:**

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

**Condition 40: sampling**

**Effective between the dates of 01/12/2000 and 01/11/2005**

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

**Item 40.1:**

This Condition applies to Emission Unit: U-PRESS

**Item 40.2:**

The results of any analysis or other procedure used for establishing compliance must be provided to the



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commissioner's representative. Representatives of the department shall be permitted, during reasonable business hours, to obtain ink and/or fountain solution samples for the purpose of determining compliance with 6NYCRR Part 234.

**Condition 41: prohibition of sale or specification**  
**Effective between the dates of 01/12/2000 and 01/11/2005**

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

**Item 41.1:**

This Condition applies to Emission Unit: U-PRESS

**Item 41.2:**

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

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

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

**Condition 42: VOC content**  
**Effective between the dates of 01/12/2000 and 01/11/2005**

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

**Item 42.1:**

This Condition applies to Emission Unit: U-PRESS

**Item 42.2:**

Any person selling a coating or ink for use at a printing process subject to 6NYCRR Part 234 must, upon request, provide the user with certification of the volatile organic compound content of the coating or ink supplied.

**Condition 1-12: Compliance Certification**  
**Effective between the dates of 05/26/2004 and 01/11/2005**

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

**Item 1-12.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PRESS

Process: 002

**New York State Department of Environmental Conservation**

**Permit ID: 2-6301-00093/00008**

**Facility DEC ID: 2630100093**



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

**Item 1-12.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

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

**Condition 1-13: Compliance Certification**

**Effective between the dates of 05/26/2004 and 01/11/2005**

**Applicable Federal Requirement: 6NYCRR 234.3(b)(2)**

**Item 1-13.1:**

The Compliance Certification activity will be performed for:



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**Permit ID: 2-6301-00093/00008**

**Facility DEC ID: 2630100093**

Emission Unit: U-PRESS

Process: 002

Emission Source: 00025

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-13.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Any owner or operator of an offset lithographic printing process subject to 6NYCRR Part 234 and employing fountain solutions containing volatile organic compounds shall not operate, cause, allow, or permit the operation of such process unless one of the control strategies specified in Part 234.3(b) are employed. Continuing compliance shall be verified by maintaining records of formulation data as specified in 6 NYCRR §234.4(b)(2) and (3). These records shall contain the following information:

1. Certification from the fountain solution supplier/manufacturer which verifies the composition of the fountain solution solvent/volatiles, if supported by actual batch records,
2. Purchase, usage, and/or production records of the fountain solutions and solvents.
3. Any other parameters used to verify compliance.

Upon request by DEC, the permittee shall perform Method 24 analyses (or supply samples to DEC for analysis) to verify the VOC content and volatile fraction of the fountain solutions. When there is any discrepancy between the calculated formulation and the Method 24 results, the Method 24 results shall be used for compliance purposes.

For presses in operation on or after September 1, 1988, where the control strategy is to use low-VOC fountain solution, the fountain solution must contain 10 percent by weight or less of VOC.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 10 percent by weight

Reference Test Method: Method 24

Monitoring Frequency: AS REQUIRED - SEE MONITORING



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**DESCRIPTION**

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

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

**Condition 1-14: Compliance Certification**

**Effective between the dates of 05/26/2004 and 01/11/2005**

**Applicable Federal Requirement: 6NYCRR 234.3(b)(2)**

**Item 1-14.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PRESS

Process: 002

Emission Source: 00026

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-14.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Any owner or operator of an offset lithographic printing process subject to 6NYCRR Part 234 and employing fountain solutions containing volatile organic compounds shall not operate, cause, allow, or permit the operation of such process unless one of the control strategies specified in Part 234.3(b) are employed. Continuing compliance shall be verified by maintaining records of formulation data as specified in 6 NYCRR §234.4(b)(2) and (3). These records shall contain the following information:

1. Certification from the fountain solution supplier/manufacturer which verifies the composition of the fountain solution solvent/volatiles, if supported by actual batch records,
2. Purchase, usage, and/or production records of the fountain solutions and solvents.
3. Any other parameters used to verify compliance.

Upon request by DEC, the permittee shall perform Method 24 analyses (or supply samples to DEC for analysis) to verify the VOC content and volatile fraction of the fountain



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solutions. When there is any discrepancy between the calculated formulation and the Method 24 results, the Method 24 results shall be used for compliance purposes.

For presses in operation on or after September 1, 1988, where the control strategy is to use low-VOC fountain solution, the fountain solution must contain 10 percent by weight or less of VOC.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: FOUNTAIN SOLUTION  
Parameter Monitored: VOC CONTENT  
Upper Permit Limit: 10 percent by weight  
Reference Test Method: Method 24  
Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2004.  
Subsequent reports are due every 6 calendar month(s).

**Condition 45: Compliance Certification**  
**Effective between the dates of 01/12/2000 and 01/11/2005**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(ii)**

**Item 45.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PRESS Emission Point: 000M5

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

**Item 45.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Surface coating operations which are not subject to Part 228 of this Title which use a surface coating with a maximum volatile organic compound content of 3.5 pounds VOC per gallon as applied (minus water and excluded VOC) as calculated according to the formula in section

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228.2(b)(11) of this Title are equipped with reasonably available control technology.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: METHOD 24

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**STATE ONLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

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

**Condition 1-15: Contaminant List**

**Effective between the dates of 05/26/2004 and 01/11/2005**

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

**Item 1-15.1:**

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



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CAS No: 0NY998-00-0

Name: VOC

**Condition 1-16: Unavoidable noncompliance and violations**  
**Effective between the dates of 05/26/2004 and 01/11/2005**

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

**Item 1-16.1:**

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.



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(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 1-17: Facility Permissible Emissions**

**Effective between the dates of 05/26/2004 and 01/11/2005**

**Applicable State Requirement: 6NYCRR 201-7**

**Item 1-17.1:**

The sum of emissions from the emission units specified in this permit shall not exceed the following Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0 (From Mod 1) PTE: 71,000 pounds per year  
Name: VOC

**Condition 48: Air pollution prohibited**

**Effective between the dates of 01/12/2000 and 01/11/2005**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 48.1:**

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

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

**Condition 1-18: Capping Monitoring Condition**

**Effective between the dates of 05/26/2004 and 01/11/2005**

**Applicable State Requirement: 6NYCRR 201-7**

**Item 1-18.1:**

This condition contains the following regulations that have been capped under the authority of 6NYCRR Part 201-7. Please note that this capping condition may be both federally and state enforceable.

6NYCRR 231-2.7

**Item 1-18.2:**

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

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**Item 1-18.3:**

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 1-18.4:**

On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated 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 1-18.5:**

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

**Item 1-18.6:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PRESS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-18.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

AS A CONDITION TO THE TITLE V  
SIGNIFICANT MODIFICATION, THE FACILITY  
AGREES TO LIMIT EMISSION UNIT U-PRESS  
(SOURCE PROJECT) ANNUAL VOC EMISSIONS TO  
34 TPY.

THE U-PRESS APPROVED CAP OF 34 TPY OF VOC  
WAS COMPUTED AS FOLLOWS:

CAP FOR U-PRESS = PRIOR ALLOWABLE FOR  
U-PRESS + CAPPED PEP

WHERE THE PRIOR ALLOWABLE FOR U-PRESS IS  
11.9 TPY WHICH IS THE MAP FOR THE

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EMISSION SOURCE #25

AND, WHERE THE CAPPED PEP IS 22.5 TONS  
VOC PER YEAR (SEE 231-2.2 MONITORING  
CONDITION)

THEREFORE STANDARD FOLDINGS AGREES TO A  
CAP FOR U-PRESS =  $11.9 + 22.1 = 34$  TONS  
VOC PER YEAR.

THE NETTING ANALYSIS PERFORMED BY THE  
APPLICANT SHOWED THAT THE FACILITY  
"NETS-OUT" OF PART 231-2 (I.E. AVOIDS  
THE NEED TO COMPLY WITH THE REQUIREMENTS  
OF PART 231-2). IN ORDER TO SHOW THAT  
PART 231-2 DOES NOT APPLY TO THIS SOURCE  
PROJECT THE APPLICANT PERFORMED A "NET  
EMISSION INCREASE" (NEI) CALCULATION THAT  
SHOWED A NEI OF 22.5 TPY OF VOC. THE NEI  
IS LESS THAN THE 25 TPY SNEIT LIMITATION  
FOR VOC; THUS PART 231-2 DOES NOT APPLY  
TO THE TITLE V MODIFICATION PROJECT  
IMPLEMENTED AT STANDARD FOLDING.

- i) THE APPLICANT MUST KEEP DAILY RECORDS  
OF THE QUANTITIES AND TYPES OF INKS  
USED.
- ii) THE APPLICANT MUST KEEP RECORDS OF  
ALL INK AND SOLVENT DELIVERIES.
- iii) THE APPLICANT MUST COMPUTE MONTHLY  
THE VOC EMITTED.
- iv) THE APPLICANT MUST COMPUTE AND  
MAINTAIN RECORDS OF 12-MONTH ROLLING VOC  
EMISSION AMOUNTS. THE APPLICANT MUST  
ALSO ENSURE THAT NO 12-MONTH ROLLING VOC  
EMISSION TOTAL EXCEEDS 34 TONS.
- v) THE APPLICANT MUST REPORT  
SEMI-ANNUALLY TO DEC (IN A FORMAT  
ACCEPTABLE TO DEC) THE ITEMS LISTED IN i)  
THRU iv) ABOVE.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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**Permit ID: 2-6301-00093/00008**

**Facility DEC ID: 2630100093**

The initial report is due 7/30/2004.

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

**Condition 1-19: Capping Monitoring Condition**

**Effective between the dates of 05/26/2004 and 01/11/2005**

**Applicable State Requirement: 6NYCRR 201-7**

**Item 1-19.1:**

This condition contains the following regulations that have been capped under the authority of 6NYCRR Part 201-7. Please note that this capping condition may be both federally and state enforceable.

6NYCRR 231-2.2

**Item 1-19.2:**

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

**Item 1-19.3:**

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 1-19.4:**

On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated 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 1-19.5:**

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

**Item 1-19.6:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PRESS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-19.7:**

Compliance Demonstration shall include the following monitoring:

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Capping: Yes

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

Monitoring Description:

THE NET EMISSION INCREASE OF VOC  
RESULTING FROM THE REPLACEMENT OF THE TWO  
MIEHLE PRESSES (EMISSION SOURCES 22 AND  
23) WITH A NEW MITSUBISHI PRESS (EMISSION  
SOURCE #26) AND THE MODIFICATION OF THE  
EXISTING MITSUBISHI PRESS (EMISSION  
SOURCE #25 - MODIFIED TO ACCEPT UV  
CURABLE MATERIALS) AT EMISSION UNIT  
U-PRESS WILL BE CAPPED AT 22.5 TONS PER  
YEAR.

THE NET EMISSION INCREASE WAS DETERMINED  
AS FOLLOWS;

$$\begin{aligned} \text{NEI} &= \text{PEP} + \text{CEI} - \text{ERCs} \\ &= 22.1 + 11.9 - 11.5 \\ &= 22.5 \text{ TONS / YEAR} \end{aligned}$$

WHERE NEI IS DEFINED AS THE NET EMISSIONS  
INCREASE. IN ORDER FOR SUBPART 231-2 TO  
BE APPLICABLE IN THIS CASE, THE NEI WOULD  
NEED TO BE EQUAL OR GREATER THAN 25 TONS  
PER YEAR.

PEP IS DEFINED AS THE PROJECT EMISSION  
POTENTIAL. THE PEP MAXIMUM ANNUAL  
POTENTIAL IS 32.6 TONS PER YEAR OF VOC.  
IN ORDER TO AVOID THE REQUIREMENTS OF  
PART 231-2 , THE MANAGEMENT OF STANDARD  
FOLDING AGREED TO CAP THE PEP TO 22.5  
TONS OF VOC PER YEAR. THE OWNER MUST  
RECORD AND REPORT THE USE OF SOLVENT,  
INKS, OIL-BASED INKS, WATER-BASED  
COATINGS AND MISCELLANEOUS SOLVENTS USED  
IN OPERATIONS ASSOCIATED WITH THE NEW  
PROCESS. THE PURPOSED OF SUCH MOTITORING  
IS TO ENSURE THAT THE PEP OF THE PROJECT  
DOES NOT EXCEED 22.5 TONS OF VOC PER  
YEAR. THE 22.5 TPY NUMBER IS AN YEARLY  
TOTAL ROLLED MONTHLY.

ERCs ARE DEFINED AS EMISSION REDUCTION  
CREDITS. THE FOLLOWING ERCs WERE  
GENERATED BY EQUIPMENT CHANGES AT THE

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**FACILITY:**

REMOVAL OF ROLAND PRESS IN NOVEMBER 1997:  
6.0 TONS VOC OF ERCs

REMOVAL OF 2 MIEHLE PRESSES IN NOVEMBER  
2000: 5.5 TONS VOC OF ERCs

TOTAL ERCs FOR THIS APPLICATIONS ARE 11.5  
TONS VOC.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: INK

Upper Permit Limit: 22.5 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

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