PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 7-3504-00012/00023
Effective Date: 04/28/2009 Expiration Date: 04/27/2014

Permit Issued To:SPEAR USA LLC
6 MORRILL PL
FULTON, NY 13069

Contact: KEVIN MILES
SPEAR USA LLC
6 MORRILL PL
FULTON, NY 13069
(315) 592-0236

Facility: SPEAR USA
6 MORRILL PL
FULTON, NY 13069

Description:
Spear USA LLC operates a flexible packaging manufacturing facility in Fulton, NY. The main areas of the facility include printing, finishing, and warehousing. The main sources of air emissions are the two rotogravure printing presses used to apply graphical impressions onto various materials. The presses are subject to the provisions of 6NYCRR Part 234 with respect to volatile organic compound (VOC) emissions and 40 CFR 63 Subpart KK with respect to hazardous air pollutant (HAP) emissions.

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 H MERRIMAN, JR
1285 FISHER AVE
CORTLAND, NY 13045-1090

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
Facility Level
Submission of application for permit modification or renewal-REGION 7 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: 6NYCRR 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 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

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 7 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 5.1:
Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 7 Headquarters
Division of Environmental Permits
615 Erie Blvd West
Syracuse, NY 13204-2400
(315) 426-7400

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:SPEAR USA LLC
6 MORRILL PL
FULTON, NY 13069

Facility: SPEAR USA
6 MORRILL PL
FULTON, NY 13069

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

Permit Effective Date: 04/28/2009 Permit Expiration Date: 04/27/2014

LIST OF CONDITIONS

DEC GENERAL CONDITIONS

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Permit modifications, suspensions or revocations by the Department

Facility Level

Submission of application for permit modification or renewal-REGION 7 HEADQUARTERS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

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

Emission Unit Level

25 6NYCRR 201-6: Emission Point Definition By Emission Unit
26 6NYCRR 201-6: Process Definition By Emission Unit

EU=U-00C10

27 6NYCRR 200.7: Compliance Certification
28 6NYCRR 212.4(c): Compliance Certification
29 6NYCRR 234.3(a)(3)(ii): Compliance Certification
30 6NYCRR 234.3(a)(3)(iv): control requirements
31 6NYCRR 234.3(e): Compliance Certification

32 6NYCRR 234.4(a): control requirement-other than VOC/solvent recovery
33 6NYCRR 234.4(b)(1): control requirement
34 6NYCRR 234.4(b)(3): Compliance Certification
35 6NYCRR 234.4(c)(1): exhaust gas temperature
36 6NYCRR 234.4(c)(2): temperature rise
37 6NYCRR 234.4(c)(4): Compliance Certification
38 6NYCRR 234.4(c)(4): Compliance Certification
39 6NYCRR 234.6: Compliance Certification
40 40CFR 63.823, Subpart KK: Part 63 General Provisions requirements
41 40CFR 63.825(b)(7), Subpart KK: Control requirements for product and packaging rotogravure or wide-web flexographic presses
42 40CFR 63.825(d)(1), Subpart KK: Compliance Certification
43 40CFR 63.825(d)(1), Subpart KK: Compliance Certification
44 40CFR 63.828(a)(2)(ii), Subpart KK: Calibration of temperature monitoring equipment
45 40CFR 63.828(a)(4)(ii), Subpart KK: Temperature monitoring for a catalytic oxidizer
46 40CFR 63.828(b), Subpart KK: Compliance Certification
47 40CFR 63.829(a), Subpart KK: Subpart A record keeping provisions
48 40CFR 63.829(b), Subpart KK: Compliance Certification
49 40CFR 63.830(a), Subpart KK: Subpart A reporting requirements
50 40CFR 63.830(b)(5), Subpart KK: Compliance Certification
51 40CFR 63.830(b)(6), Subpart KK: Compliance Certification

EU=U-00C10,Proc=003,ES=WASUP
52 6NYCRR 226: Compliance Certification

EU=U-00C10,Proc=004,ES=RENZM
53 6NYCRR 226: Compliance Certification

EU=U-00C10,Proc=005,ES=TEC02
54 6NYCRR 234.4(c)(4): Compliance Certification
55 40CFR 63.825(d)(1), Subpart KK: Compliance Certification

EU=U-00C10,Proc=006,ES=TEC02
56 6NYCRR 234.4(c)(4): Compliance Certification
57 40CFR 63.825(d)(1), Subpart KK: Compliance Certification

EU=U-00C13
58 6NYCRR 229.3(e)(2)(iv): Compliance Certification
59 6NYCRR 229.5(d): Compliance Certification

EU=U-00C14
60 6NYCRR 229.3(e)(2)(v): Compliance Certification
61 6NYCRR 229.5(d): Compliance Certification

EU=U-00C15
62 6NYCRR 229.3(e)(2)(v): Compliance Certification
63 6NYCRR 229.5(d): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS
Facility Level
64 ECL 19-0301: Contaminant List

65 6NYCRR 201-1.4: Unavoidable noncompliance and violations
66 6NYCRR 211.2: Air pollution prohibited

FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

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

Item A: Emergency Defense - 6NYCRR Part 201-1.5

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

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: **Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: **Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: **Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: **Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: **Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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

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

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

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

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

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

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

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

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the

effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit 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 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 200.6

Item 1.1:
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: **Fees**
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 2.1:
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: **Recordkeeping and reporting of compliance monitoring**
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 3.1:
The following information must be included in any required compliance monitoring records and reports:

(i) The date, place, and time of sampling or measurements;

(ii) The date(s) analyses were performed;

(iii)The company or entity that performed the analyses;

(iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;

(v) The results of such analyses including quality assurance data where required; and

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

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

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 4.1:
Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 5.1:
The Compliance Certification activity will be performed for the Facility.

Item 5.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to

the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

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

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

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

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

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

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

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

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

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

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 6.1:
The Compliance Certification activity will be performed for the Facility.

Item 6.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

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

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

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

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual

compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

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

The address for the RAPCE is as follows:

615 Erie Boulevard, West
Syracuse, NY 13204-2400

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 1/30/2010.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 202-2.1

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

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

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

Condition 8: Recordkeeping requirements
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 202-2.5

Item 8.1:
(a) The following records shall be maintained for at least five years:

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

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

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

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 215

Item 9.1:
No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

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

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

Condition 10: Maintenance of Equipment
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 200.7

Item 10.1:
Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 201-1.7

Item 11.1:
Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 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 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 13.1:
The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 14.1:
The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 15: Standard Requirement - Provide Information
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 15.1:
The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 16.1:
The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

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

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

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

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 17.1:
Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

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

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

Condition 18: Off Permit Changes

Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 18.1:
No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

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

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

Condition 19: Required Emissions Tests
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 202-1.1

Item 19.1:
For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 211.3

Item 20.1:
Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 21: Accidental release provisions.
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:40CFR 68

Item 21.1:
If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:40CFR 82, Subpart F

Item 22.1:
The permittee shall comply with all applicable provisions of 40 CFR Part 82.

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

Condition 23: Emission Unit Definition
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 201-6

Item 23.1:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: U-00C10
Emission Unit Description:
This emission unit corresponds to the two emission points corresponding to the two incinerators for Cerutti 8-color and Cerutti 11-color presses.

Building(s): MAIN

Item 23.2:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: U-00C13
Emission Unit Description:
This emission unit corresponds to one emission point for the 10,000 gallon tank for storing solvent.

Building(s): OUTSIDE MB

Item 23.3:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: U-00C14
Emission Unit Description:
This emission unit corresponds to one emission point for the 8,000 gallon compartment of a two-compartment tank with a total capacity of 10,000 gallons. This compartment is used to store ethyl alcohol.

Building(s): OUTSIDE MB

Item 23.4:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: U-00C15
Emission Unit Description:
This emission unit corresponds to one emission point for the 2,000 gallon compartment of a two-compartment tank with a total capacity of 10,000 gallons. This compartment is used to store ethyl acetate.

Building(s): OUTSIDE MB

Condition 24: Non Applicable requirements
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 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.

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

Condition 25: Emission Point Definition By Emission Unit
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 201-6

Item 25.1:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00C10

Emission Point: 0C101
Height (ft.): 40 Diameter (in.): 44
NYTMN (km.): 4797.1 NYTME (km.): 384. Building: MAIN

Emission Point: 0C102
Height (ft.): 40 Diameter (in.): 44
NYTMN (km.): 4797.1 NYTME (km.): 384. Building: MAIN

Item 25.2:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00C13

Emission Point: 00C13
Height (ft.): 12 Diameter (in.): 6
NYTMN (km.): 4797.1 NYTME (km.): 384. Building: OUTSIDE MB

Item 25.3:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00C14

Emission Point: 00C14
Height (ft.): 12 Diameter (in.): 6
NYTMN (km.): 4797.1 NYTME (km.): 384. Building: OUTSIDE MB

Item 25.4:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00C15

Emission Point: 00C15
Height (ft.): 12 Diameter (in.): 6
NYTMN (km.): 4797.1 NYTME (km.): 384. Building: OUTSIDE MB

Condition 26: Process Definition By Emission Unit
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 201-6

Item 26.1:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00C10
Process: 003 Source Classification Code: 4-01-002-98
Process Description: Washup (washup units, press wash and floor wash).

Emission Source/Control: TEC02 - Control
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: WASUP - Process

Item 26.2:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00C10
Process: 004 Source Classification Code: 4-01-003-99
Process Description: Renzmann washing unit

Emission Source/Control: TEC02 - Control
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: RENZM - Process

Item 26.3:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00C10
Process: 005 Source Classification Code: 4-05-005-11
Process Description:
Cerutti8 8-color rotogravure press - printing operation.

Emission Source/Control: TEC02 - Control
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: CRT08 - Process

Item 26.4:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00C10
Process: 006 Source Classification Code: 4-05-005-11
Process Description:
Cerutti11 11-color rotogravure press - printing operation.

Emission Source/Control: TEC02 - Control
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: CRT11 - Process

Item 26.5:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00C13
Process: 009 Source Classification Code: 4-07-044-05
Process Description:
solvent storage tank with conservation vent and submerged fill-standing losses

Emission Source/Control: TANK1 - Process

Item 26.6:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00C13
Process: 010 Source Classification Code: 4-07-044-06
Process Description:
solvent storage tank with conservation vent and submerged fill - working losses

Emission Source/Control: TANK1 - Process

Item 26.7:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00C14
Process: 011 Source Classification Code: 4-07-044-97
Process Description:
Ethyl alcohol storage tank with conservation vent and submerged fill- standing losses

Emission Source/Control: TANK2 - Process

Item 26.8:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00C14
Process: 012 Source Classification Code: 4-07-044-98
Process Description:
Ethyl alcohol storage tank with conservation vent and submerged fill-working losses

Emission Source/Control: TANK2 - Process

Item 26.9:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00C15
Process: 013 Source Classification Code: 4-07-008-09
Process Description:
Ethyl acetate storage tank with conservation vent and submerged fill- standing losses

Emission Source/Control: TANK3 - Process

Item 26.10:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00C15
Process: 014 Source Classification Code: 4-07-008-09
Process Description:
Ethyl acetate storage tank with conservation vent and

submerged fill- working losses

Emission Source/Control: TANK3 - Process

Condition 27: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 200.7

Item 27.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Item 27.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The catalyst of each incinerator shall be sampled and analyzed at least once per year. The analysis results shall be submitted to the Department with the next required semi-annual monitoring report. The catalyst must be replaced if the analysis does not show that the catalyst can meet the required destruction efficiency at the average catalyst bed inlet temperature determined during the most recent incinerator stack test.

Monitoring Frequency: ANNUALLY
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 28: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 212.4(c)

Item 28.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 28.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of

the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.05 grains per dscf
Reference Test Method: EPA Method 5
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 29: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 29.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

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

Item 29.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Where a packaging rotogravure process is employed the capture system and air cleaning device must provide for an overall reduction in volatile organic compound emissions of at least 65.0 percent.

Performance tests must be performed at the discretion of the Department in accordance with 6NYCRR Part 202-1.

Parameter Monitored: VOC
Lower Permit Limit: 65 percent reduction by weight (corrected to 7% O2, dry basis)
Reference Test Method: Per 234.4(b)
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 30: control requirements
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 30.1:

This Condition applies to Emission Unit: U-00C10

Item 30.2:
The overall removal efficiency is determined by testing the capture efficiency and the removal efficiency of the control equipment, utilizing test methods acceptable to the commissioner.

Condition 31: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 234.3(e)

Item 31.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

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 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 this Part. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during the operation of this emission unit.

Parameter Monitored: OPACITY
Upper Permit Limit: 10 percent
Reference Test Method: Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 32: control requirement-other than VOC/solvent recovery
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 234.4(a)

Item 32.1:
This Condition applies to Emission Unit: U-00C10

Item 32.2:
When a printing process utilizes control equipment to comply with the provisions 6NYCRR Part 234, test methods acceptable to the Department must be used when demonstrating the overall removal efficiency.

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

Condition 33: control requirement
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 33.1:
This Condition applies to Emission Unit: U-00C10

Item 33.2:
The owner or operator must follow notification requirements, protocol requirements and test procedures of 6NYCRR Part 202 for testing and monitoring. Depending upon the conditions at a test site, one of the following test methods form Appendix A of 40 CFR 60 must be used when measuring volatile organic compound (VOC) concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

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

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

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

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

Condition 34: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 34.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

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

Item 34.2:
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 PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 35: exhaust gas temperature
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 35.1:
This Condition applies to Emission Unit: U-00C10

Item 35.2:
Continuous monitors to measure the exhaust gas temperature of all incinerators shall be installed, periodically calibrated and operated at all times the incinerator is operating.

Condition 36: temperature rise
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 36.1:
This Condition applies to Emission Unit: U-00C10

Item 36.2:

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

Condition 37: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 37.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Item 37.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Each opening into the press room that was not determined to be a natural draft opening (NDO), during the most recent successful EPA Method 204 permanent total enclosure verification test, must be kept closed at all times except for the momentary movement of personnel or equipment. Each opening that was not determined to be an NDO must be conspicuously labeled indicating that the opening must be kept closed. These labels must be checked periodically to ensure the labels remain present and in readable condition.

The only forced draft air exiting the press room shall be through an operating incinerator at all times any ink is present in any press contained in the press room.

The only forced draft air exiting the Renzmann room shall be through an operating incinerator at all times the Renzmann unit is being operated.

The only forced draft air exiting the washup room shall be through an operating incinerator at all times any degreasing equipment contained in the room is being operated.

Each Semi-annual Monitoring report and Annual Compliance Certification must contain information regarding the compliance status of the requirements stated in this condition.

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 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 38.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

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

Item 38.2:
Compliance Certification shall include the following monitoring:

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

To ensure Permanent Total Enclosure status is maintained in the press room, a pressure monitor and recorder shall be installed to monitor the differential pressure between the inside and outside of the press room. The monitor and recorder shall be operated at all times that inks are present in the application areas of the presses. A magnehelic gauge shall also be installed in the area of the pressure monitor to monitor the differential pressure between the inside and outside of the press room. The magnehelic gage shall be checked once per shift when the pressure monitor readings reach the limit of the pressure monitor scale.

The 3-hour block average press room differential pressure must be -0.007 inches of water or greater vacuum when any press in the press room is printing (i.e. running in the "impressions down" mode of operation). The 3-hour block average press room differential pressure must be negative at any other press idle time where ink is present in any press ink pan (i.e. any press is "inked up") contained in the press room.

Parameter Monitored: PRESSURE
Upper Permit Limit: -0.007 inches of water
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 39: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 234.6

Item 39.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Item 39.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The following work practices are prohibited:
(a) using open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or ink/coating removal;

(b) storage in open containers of spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;

(c) use of open containers to store or dispose of inks and/or surface coatings; or

(d) use of open containers to store or dispense inks and/or surface coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

The above listed work practice prohibitions must be displayed conspicuously in areas where the above mentioned inks and/or solvents are handled, mixed, and/or used.

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 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 40: Part 63 General Provisions requirements
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:40CFR 63.823, Subpart KK

Item 40.1:

This Condition applies to Emission Unit: U-00C10

Item 40.2:
Table 1 to 40CFR63 Subpart KK provides cross references to the 40CFR Part 63 Subpart A, General Provisions, indicating the applicability of the General Provisions requirements to Subpart KK.

Condition 41: Control requirements for product and packaging rotogravure or wide-web flexographic presses
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 41.1:
This Condition applies to Emission Unit: U-00C10

Item 41.2:
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 42: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 42.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

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

Item 42.2:
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), 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.

To ensure Permanent Total Enclosure status is maintained

in the press room, a pressure monitor and recorder shall be installed to monitor the differential pressure between the inside and outside of the press room. The monitor and recorder shall be operated at all times that inks are present in the application areas of the presses. A magnehelic gauge shall also be installed in the area of the pressure monitor to monitor the differential pressure between the inside and outside of the press room. The magnehelic gage shall be checked once per shift when the pressure monitor readings reach the limit of the pressure monitor scale.

The 3-hour block average press room differential pressure must be -0.007 inches of water or greater vacuum when any press in the press room is printing (i.e. running in the "impressions down" mode of operation). The 3-hour block average press room differential pressure must be negative at any other press idle time where ink is present in any press ink pan (i.e. any press is "inked up") contained in the press room.

Parameter Monitored: PRESSURE
Upper Permit Limit: -0.007 inches of water
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 43: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 43.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Item 43.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Each opening into the press room that was not determined to be a natural draft opening (NDO), during the most recent successful EPA Method 204 permanent total enclosure verification test, must be kept closed at all times except for the momentary movement of personnel or equipment. Each opening that was not determined to be an NDO must be conspicuously labeled indicating that the opening must be kept closed. These labels must be checked periodically to

ensure the labels remain present and in readable condition.

The only forced draft air exiting the press room shall be through an operating incinerator at all times any ink is present in any press contained in the press room.

The only forced draft air exiting the Renzmann room shall be through an operating incinerator at all times the Renzmann unit is being operated.

The only forced draft air exiting the washup room shall be through an operating incinerator at all times any degreasing equipment contained in the room is being operated.

Each Semi-annual Monitoring report and Annual Compliance Certification must contain information regarding the compliance status of the requirements stated in this condition.

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 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 44: Calibration of temperature monitoring equipment
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 44.1:
This Condition applies to Emission Unit: U-00C10

Item 44.2:
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 45: Temperature monitoring for a catalytic oxidizer
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 45.1:

This Condition applies to Emission Unit: U-00C10

Item 45.2:
An owner or operator complying with the requirements of 40CFR63.824-63.825 through the use of a catalytic oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall 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 vent stream at the nearest feasible point to the catalyst bed inlet.

Condition 46: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 46.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Item 46.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Any excursion from the required operating parameters which are monitored in accordance with paragraphs (a)(4) and (a)(5) of this section, unless otherwise excused, shall be considered a violation of the emission standard.

Excursions, if any, and corrective actions must be documented and reported in accordance with the terms and conditions of this permit.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 47: Subpart A record keeping provisions
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 47.1:
This Condition applies to Emission Unit: U-00C10

Item 47.2:
The record keeping provisions of 40CFR Part 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40CFR63 Subpart KK are listed in Table 1 of 40CFR63 Subpart KK.

Condition 48: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 48.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Item 48.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Each owner or operator of an affected major source that is subject to 40CFR Part 63 Subpart KK shall maintain the following records (as specified in paragraphs (b)(1) and (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(c) for each continuous monitoring system operated by the owner or operator in accordance with the requirements of 40CFR63.828(a).

Reporting on these records must be performed in accordance with the terms and conditions of this permit. These records must also be presented to the Department upon request.

Monitoring Frequency: MONTHLY
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 49: Subpart A reporting requirements
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 49.1:
This Condition applies to Emission Unit: U-00C10

Item 49.2: The reporting provisions of 40CFR Part 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40CFR Part 63 Subpart KK are listed in Table 1 of Subpart KK.

Condition 50: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:40CFR 63.830(b)(5), Subpart KK

Item 50.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Item 50.2:
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 40CFR63 Subpart KK that is using a control device to comply with Subpart KK shall submit start-up, shutdown, and malfunction reports as specified in Section 63.10(d)(5).

The start-up, shutdown, and malfunction report shall be submitted semiannually. The report shall be delivered or postmarked by the 30th day following the end of each calendar half. Reports shall only be required if a start-up, shutdown, or malfunction occurred during the reporting period.

If actions taken by an owner or operator during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in Section 63.6(e)(3), the owner or operator shall state such information in the report. The start-up, shutdown, or malfunction plan shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that shall be submitted to the Department.

Separate start-up, shutdown, or malfunction reports are not required if the information is included in the semiannual report for the affected source

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.

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

Condition 51: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:40CFR 63.830(b)(6), Subpart KK

Item 51.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Item 51.2:
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 40CFR63 Subpart KK shall submit a Summary Report, as specified in 40CFR63.10(e)(3), on a semi-annual basis.

In addition to a report of operating parameter exceedances as required by Section 63.10(e)(3)(i), the summary report shall include, as applicable:
1. Exceedances of the standards in Sections 63.824-63.825.
2. Exceedances of either of the criteria of Section 63.820(a)(2).
3. Exceedances of the criterion of Section 63.821(b)(1) and the criterion of Section 63.821(b)(2) in the same month.
4. Exceedances of the criterion of Section 63.821(a)(2)(ii)(A).

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 226

Item 52.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10
Process: 003 Emission Source: WASUP

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

6NYCRR 226. Requirements for Cold Cleaning Degreasers
(For Title V after 12/31/2003)

A. Equipment Specifications

The following types of control equipment must be used when conducting cold cleaning degreasing, solvent metal cleaning:

(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. One acceptable control system would be a permanent total enclosure having control equipment that is designed and operated with an overall VOC removal efficiency of 90 percent or greater.
This control system specification does not apply to remote reservoir degreasers.
(4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C. This limitation does not apply to degreasers 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.

B. Operating Requirements:

When cold cleaning, the clean parts must be drained at least 15 seconds or until dripping ceases.

C. General Requirements:

A Person conducting solvent metal cleaning must:
(1) 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.
(2) Maintain equipment to minimize leaks and fugitive emissions.
(3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
(4) Keep the degreaser cover closed except when:
(a) parts are being placed into or being removed from the degreaser;
(b) adding or removing solvent from the degreaser;

(c) no solvent is in the degreaser; or
(d) when manually cleaning metal parts in the cold cleaning degreaser.
(5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
(6) Do not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.
(7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), 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.
(a) the name and address of the solvent supplier;
(b) the type of solvent including the product or vendor identification number; and
(c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).
(8) Include in the semiannual monitoring report and annual compliance certifications (required of all permitteres subject to Title V) the solvent consumption required under (5) above, as well as a statement that the premittee's obligations under items (1) through (7) above have been met for the period of the report or certification.. This statement must be based on the permittees observations on a daily basis that the operation of the solvent metal cleaning process has met the above criteria. The permittee must maintain a log of instances when the above have not been met, and such statement must summarize these instances.

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 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 53: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 226

Item 53.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10
Process: 004 Emission Source: RENZM

Item 53.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

6NYCRR 226. Requirements for Cold Cleaning Degreasers
(For Title V after 12/31/2003)

A. Equipment Specifications

The following types of control equipment must be used when conducting cold cleaning degreasing, solvent metal cleaning:

(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. One acceptable control system would be a permanent total enclosure having control equipment that is designed and operated with an overall VOC removal efficiency of 90 percent or greater.
This control system specification does not apply to remote reservoir degreasers.
(4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C. This limitation does not apply to degreasers 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.

B. Operating Requirements:

When cold cleaning, the clean parts must be drained at least 15 seconds or until dripping ceases.

C. General Requirements:

A Person conducting solvent metal cleaning must:
(1) 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.
(2) Maintain equipment to minimize leaks and fugitive emissions.
(3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
(4) Keep the degreaser cover closed except when:
(a) parts are being placed into or being removed from the degreaser;

(b) adding or removing solvent from the degreaser;
(c) no solvent is in the degreaser; or
(d) when manually cleaning metal parts in the cold cleaning degreaser.
(5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
(6) Do not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.
(7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), 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.
(a) the name and address of the solvent supplier;
(b) the type of solvent including the product or vendor identification number; and
(c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).
(8) Include in the semiannual monitoring report and annual compliance certifications (required of all permitteres subject to Title V) the solvent consumption required under (5) above, as well as a statement that the premittee's obligations under items (1) through (7) above have been met for the period of the report or certification.. This statement must be based on the permittees observations on a daily basis that the operation of the solvent metal cleaning process has met the above criteria. The permittee must maintain a log of instances when the above have not been met, and such statement must summarize these instances.

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 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 54: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

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

Emission Unit: U-00C10
Process: 005 Emission Source: TEC02

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

Item 54.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Catalyst bed inlet temperature of the incinerator controlling emissions from the Cerutti 8 press shall be monitored and recorded at all times during incinerator operation for the destruction of VOCs. The compliance value for temperature may change and will be the 3-hour average value as determined from the most recent performance test that shows compliance with the control requirements.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 520 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 55: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 55.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10
Process: 005 Emission Source: TEC02

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

Item 55.2:
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), 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.

Catalyst bed inlet temperature of the incinerator controlling emissions from the Cerutti 8 press shall be monitored and recorded at all times during incinerator operation for the destruction of VOCs. The compliance value for temperature may change and will be the 3-hour average value as determined from the most recent performance test that shows compliance with the control requirements.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 520 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 56: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 56.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10
Process: 006 Emission Source: TEC02

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

Item 56.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Catalyst bed inlet temperature of the incinerator controlling emissions from the Cerutti 11 press shall be monitored and recorded at all times during incinerator operation for the destruction of VOCs. The compliance value for temperature may change and will be the 3-hour average value as determined from the most recent performance test that shows compliance with the control requirements.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 517 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 57: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

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

Emission Unit: U-00C10
Process: 006 Emission Source: TEC02

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

Item 57.2:
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), 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.

Catalyst bed inlet temperature of the incinerator controlling emissions from the Cerutti 11 press shall be monitored and recorded at all times during incinerator operation for the destruction of VOCs. The compliance value for temperature may change and will be the 3-hour average value as determined from the most recent performance test that shows compliance with the control requirements.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 517 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 58: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 229.3(e)(2)(iv)

Item 58.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C13

Item 58.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Storage tanks subject to this requirement, with a capacity greater than or equal to 10,000 gallons but less than 20,000 gallons must be equipped with submerged fill. The permittee shall visually inspect the submerged fill line on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 59: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 229.5(d)

Item 59.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C13

Item 59.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Records must be presented upon request by the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 60: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 60.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C14

Item 60.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 61: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 229.5(d)

Item 61.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C14

Item 61.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Records must be presented upon request by the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 62: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

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

Item 62.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C15

Item 62.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 63: Compliance Certification
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable Federal Requirement:6NYCRR 229.5(d)

Item 63.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-00C15

Item 63.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The owner or operator of a volatile organic liquid storage tank that is subject to 6NYCRR Part 229 must

maintain a record of the capacity (in gallons) of the volatile organic liquid storage tank at the facility.

Records must be presented upon request by the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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 64: Contaminant List
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable State Requirement:ECL 19-0301

Item 64.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY998-00-0
Name: VOC

Condition 65: Unavoidable noncompliance and violations
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable State Requirement:6NYCRR 201-1.4

Item 65.1:
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 66: Air pollution prohibited
Effective between the dates of 04/28/2009 and 04/27/2014

Applicable State Requirement:6NYCRR 211.2

Item 66.1:
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.