



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 7-3504-00012/00023  
Effective Date: 06/02/2016 Expiration Date: 06/01/2021

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:  
Title V Renewal

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: ELIZABETH A TRACY  
615 ERIE BLVD WEST  
SYRACUSE, NY 13204-2400

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: 6 NYCRR 621.11**

**Item 3.1:**

The permittee must submit a renewal application at least 180 days before expiration of permits for both Title V and 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: 6 NYCRR 621.13**

**Item 4.1:**



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

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

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

**Condition 5: Submission of application for permit modification or renewal-REGION 7 HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 7 Headquarters  
Division of Environmental Permits  
615 Erie Blvd West  
Syracuse, NY 13204-2400  
(315) 426-7400

**New York State Department of Environmental Conservation**

Permit ID: 7-3504-00012/00023

Facility DEC ID: 7350400012



**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:  
2754 - COMMERCIAL PRINTING, GRAVURE  
2759 - COMMERCIAL PRINTING, NEC  
3471 - ELECTROPLATING, POLISHING, ANODIZING, AND COLORING

Permit Effective Date: 06/02/2016

Permit Expiration Date: 06/01/2021



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (a) (7): Fees
- 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 23 6 NYCRR 211.1: Air pollution prohibited
- 24 40CFR 63.828(a)(1), Subpart KK: Monitoring requirements for owners or operators.

**Emission Unit Level**

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

**EU=U-00C10**

- 27 6 NYCRR 200.7: Compliance Certification
- 28 6 NYCRR 212-2.4 (b): Compliance Certification
- 29 6 NYCRR 234.3 (a) (1) (ii) ('b'): Compliance Certification
- 30 6 NYCRR 234.4 (b): Compliance Certification
- 31 6 NYCRR 234.4 (c): Compliance Certification
- 32 6 NYCRR 234.4 (c): Compliance Certification
- 33 6 NYCRR 234.4 (c): Compliance Certification
- 34 6 NYCRR 234.4 (c): Compliance Certification
- 35 6 NYCRR 234.4 (c): Compliance Certification
- 36 6 NYCRR 234.6: Compliance Certification
- 37 6 NYCRR 234.7: Compliance Certification
- 38 6 NYCRR 234.8: Compliance Certification
- 39 40CFR 63.823, Subpart KK: Part 63 General Provisions requirements



- 40 40CFR 63.825(b), Subpart KK: Compliance Certification
- 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 6 NYCRR Part 226: Compliance Certification

**EU=U-00C10,Proc=004,ES=RENZM**

- 53 6 NYCRR Part 226: Compliance Certification

**EU=U-00C10,Proc=005,ES=TEC02**

- 54 40CFR 63.825(d)(1), Subpart KK: Compliance Certification

**EU=U-00C10,Proc=006,ES=TEC02**

- 55 40CFR 63.825(d)(1), Subpart KK: Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 56 ECL 19-0301: Contaminant List
- 57 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities



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

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

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

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

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

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

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

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

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

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and



reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

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

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

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

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

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

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

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



facility for any violation of applicable requirements prior to or at the time of permit issuance;

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

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

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

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

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

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

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

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

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

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



a shorter time period in the case of an emergency.

**Item K: 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 L: 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 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement: 6 NYCRR 200.6**

**Item 1.1:**

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





**Condition 5: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (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 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate



whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2016.

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

**Condition 6: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (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 annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section  
USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
NYSDEC Region 7 Headquarters  
615 Erie Boulevard, West  
Syracuse, NY 13204-2400

The address for the BQA is as follows:

NYSDEC  
Bureau of Quality Assurance

**New York State Department of Environmental Conservation**

Permit ID: 7-3504-00012/00023

Facility DEC ID: 7350400012



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 1/30/2017.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, 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 06/02/2016 and 06/01/2021**

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

**Item 8.1:**

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

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

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

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

**Condition 9: Open Fires - Prohibitions**  
**Effective between the dates of 06/02/2016 and 06/01/2021**



**Applicable Federal Requirement:6 NYCRR 215.2**

**Item 9.1:**

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

**Item 9.2**

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

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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





**Condition 14: Trivial Sources - Proof of Eligibility**  
Effective between the dates of 06/02/2016 and 06/01/2021

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

**Item 14.1:**

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

**Condition 15: Requirement to Provide Information**  
Effective between the dates of 06/02/2016 and 06/01/2021

**Applicable Federal Requirement:6 NYCRR 201-6.4 (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: Right to Inspect**  
Effective between the dates of 06/02/2016 and 06/01/2021

**Applicable Federal Requirement:6 NYCRR 201-6.4 (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: Off Permit Changes**



**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 17.1:**

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

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

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

**Condition 18: Required Emissions Tests**

**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 18.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

**Condition 19: Accidental release provisions.**

**Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement:40 CFR Part 68**

**Item 19.1:**

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:



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**Item 21.3:**

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 21.4:**

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 22: Progress Reports Due Semiannually**

**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 22.1:**

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 23: Air pollution prohibited**

**Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 23.1:**

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.

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**Condition 24: Monitoring requirements for owners or operators.  
Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement:40CFR 63.828(a)(1), Subpart KK**

**Item 24.1:**

Owners or operators of product and packaging rotogravure or wide-web flexographic presses with intermittently-controllable work stations shall follow one of the procedures in paragraphs 40 CFR 63.828(a)(1)(i) through (a)(1)(iv) for each dryer associated with such a work station.

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

**Condition 25: Emission Point Definition By Emission Unit  
Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement:6 NYCRR Subpart 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



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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 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement:6 NYCRR Subpart 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







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Facility DEC ID: 7350400012

Monitoring Frequency: ANNUALLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 28: Compliance Certification**

**Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement:6 NYCRR 212-2.4 (b)**

**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:

No owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Compliance will be determined through stack testing using EPA Method 5 upon request from the Department, in accordance with 6 NYCRR 202-1 and a protocol approved by the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 29: Compliance Certification**

**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 29.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Regulated Contaminant(s):





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

(ii) Method 25, Determination of Total Gaseous Non-methane Organic Emissions as Carbon; or

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

(iv) Methods not listed above must be approved in advance by the Department and the United States Environmental Protection Agency.

Acceptable analytical methods for determining the VOC content, water content, density, volume of solids and weight of solids of surface coatings and printing inks are presented in appendix A, methods 24 and 24A (as appropriate), of 40 CFR 60 (see Table I, 6 NYCRR Part 200.9). Alternate analytical methods for surface coating and printing ink analysis must be approved by the Department and the United States Environmental Protection Agency. Instead of analytical methods, the Department may accept the manufacturer's certification of VOC content of ink coating or adhesives, if supported by actual batch records.

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2017.  
Subsequent reports are due every 12 calendar month(s).

**Condition 31: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**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: 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 7/30/2016.

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

**Condition 32: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 32.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

**Item 32.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

1. 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.
2. The facility shall maintain the temperature at the



inlet to the catalyst at or above the average temperature that was recorded during the most recent compliance test.

The compliance value for temperature shown below 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.

3. The applicant must inform the Department, in the semi-annual report, whether he or she has complied with this condition.

Parameter Monitored: TEMPERATURE  
Upper 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 7/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 33: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 33.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

**Item 33.2:**  
Compliance Certification shall include the following monitoring:

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

Monitoring Description:

1. 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.
2. The facility shall maintain the temperature at the inlet to the catalyst at or above the average temperature that was recorded during the most recent compliance test.

The compliance value for temperature shown below 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.



3. The applicant must inform the Department, in the semi-annual report, whether he or she has complied with this condition.

Parameter Monitored: TEMPERATURE  
Upper 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 7/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 34: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 34.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

**Item 34.2:**

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.



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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 7/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 35: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 35.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Continuous monitors to measure and record the exhaust gas temperature and the catalyst inlet temperature of the incinerators shall be installed, periodically calibrated and operated at all times.

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 7/30/2016.

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

**Condition 36: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement:6 NYCRR 234.6**

**Item 36.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

Regulated Contaminant(s):

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CAS No: 0NY998-00-0 VOC

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility subject to this Part shall not:

(a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(c) Use open containers to store, dispose or dispense ink, coating or adhesive 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, coating or adhesive to a substrate.

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

**Condition 37: Compliance Certification**

**Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement:6 NYCRR 234.7**

**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:

Purchase, use, and production records of ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material must be maintained in a format acceptable to the department, and upon request, submitted to the department. Any other information required to determine compliance with this Part must be provided to the department in an

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acceptable format. Records must be maintained at the facility for five years.

The results of an analysis or other procedure used to establish compliance with this Part must be provided to the department. Department representatives shall be permitted, during reasonable business hours, to obtain ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

**Condition 38: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement: 6 NYCRR 234.8**

**Item 38.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

**Item 38.2:**

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 ten percent or greater for any consecutive six minute period from any emission source subject to 6 NYCRR 234. The DEC 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: EPA 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 39: Part 63 General Provisions requirements**  
**Effective between the dates of 06/02/2016 and 06/01/2021**



**Applicable Federal Requirement:40CFR 63.823, Subpart KK**

**Item 39.1:**

This Condition applies to Emission Unit: U-00C10

**Item 39.2:**

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 40: Compliance Certification**  
Effective between the dates of 06/02/2016 and 06/01/2021

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

**Item 40.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00C10

**Item 40.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This condition is applicable if the owner or operator elects to comply with 40 CFR Part 63, Subpart KK using low-HAP containing materials.

1. The owner or operator has installed two control devices, one each on its rotogravure coaters. As an alternative to complying using add-on control and achieving 95% capture and control, the owner or operator may demonstrate compliance by:

i) limiting the HAP emissions to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied per month, or

ii) limiting HAP emissions to no more than 20 percent of the mass of solids applied per month.

2. To demonstrate compliance with low-HAP containing materials, the owner or operator shall follow one of the procedures in 40 CFR 63.825(b)(1) - (b)(10).

3. To determine the weight fraction of organic HAP of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials, the owner or

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operator shall follow the procedures of 40 CFR 63.827(b).

4. The owner or operator must maintain documentation of the amount of organic HAP contained in the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials that are used.

5. The owner or operator must submit semi-annual reports as required in 40 CFR 63.830(b)(6).

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: 4 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: CALENDAR MONTH AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2016.

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

**Condition 41: Control requirements for product and packaging rotogravure or wide-web flexographic presses  
Effective between the dates of 06/02/2016 and 06/01/2021**

**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 06/02/2016 and 06/01/2021**

**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):

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CAS No: 0NY100-00-0 TOTAL 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 7/30/2016.

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

**Condition 43: Compliance Certification**

**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 43.1:**

**New York State Department of Environmental Conservation**

Permit ID: 7-3504-00012/00023

Facility DEC ID: 7350400012



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 7/30/2016.

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

**Condition 44: Calibration of temperature monitoring equipment  
Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 44.1:**

**New York State Department of Environmental Conservation**

Permit ID: 7-3504-00012/00023

Facility DEC ID: 7350400012



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 06/02/2016 and 06/01/2021**

**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 06/02/2016 and 06/01/2021**

**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

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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 06/02/2016 and 06/01/2021**

**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 06/02/2016 and 06/01/2021**

**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

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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 06/02/2016 and 06/01/2021**

**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 06/02/2016 and 06/01/2021**

**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 7/30/2016.

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

**Condition 51: Compliance Certification**

**Effective between the dates of 06/02/2016 and 06/01/2021**

**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)

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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 7/30/2016.

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

**Condition 52: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement: 6 NYCRR Part 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 permittees subject to Title V) the solvent consumption required under (5) above, as well as a statement that the permittee'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 7/30/2016.

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

**Condition 53: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

**Applicable Federal Requirement:6 NYCRR Part 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 permittees subject to Title V) the solvent consumption required under



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(5) above, as well as a statement that the permittee'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 7/30/2016.

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

**Condition 54: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**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 TOTAL HAP

**Item 54.2:**

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.

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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 7/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 55: Compliance Certification**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

**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: 006 Emission Source: TEC02

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL 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 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 7/30/2016.  
Subsequent reports are due every 6 calendar month(s).



**STATE ONLY ENFORCEABLE CONDITIONS**  
**\*\*\*\* Facility Level \*\*\*\***

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

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

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

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

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

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

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

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

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

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

**Item B: 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 56: Contaminant List**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 56.1:**  
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: TOTAL HAP

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

**Condition 57: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 06/02/2016 and 06/01/2021**

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

**Item 57.1:**  
(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.



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

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

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

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

