



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-2654-00064/01203
Effective Date: 06/16/2015 Expiration Date: 06/15/2025

Permit Issued To: XEROX CORPORATION
45 GLOVER AVE
NORWALK, CT 06850-1600

Facility: XEROX JOSEPH C WILSON CTR FOR TECHNOLOGY
800 PHILLIPS RD
WEBSTER, NY 14580

Contact: JOSEPH STULB
XEROX CORP - JOSEPH C WILSON CTR FOR TECHNOLOGY
800 PHILLIPS RD BLDG 205-99F
WEBSTER, NY 14580
(585) 422-9736

Description:

Air State Facility (ASF) Permit to authorize the construction of a new web process by upgrading the Active Matrix Active Transport (AMAT) pilot plant web coating line at the Joseph C Wilson Center for Technology in the Town of Webster (Webster Facility). Construction and Operation of a new category of electronic components including installing new equipment including a gravure and rotary screen printing station, modifying the dryers, changing our oven rollers and replacing coating delivery systems, etc. to allow the new product to be printed on web (polymer).

Continued operation of the expanded source and current facility operations are authorized by the SAPA extended Title V Facility Permit, currently in the process of renewal by the Department, which will be the subject of a separate public notice.

The Xerox Webster Facility is subject to 6 NYCRR Part 201-6 (Title V) due to potential emissions of oxides of nitrogen (NO_x), sulfur dioxide (SO₂), total particulate matter (PM) in excess of 100 tons per year, volatile organic compounds (VOC) in excess of 50 tons per year, total hazardous air pollutants (HAP) in excess of 25 tons per year, and the individual HAP methylene chloride in excess of 10 tons per year.

It is also an Existing Major Facility as defined in 40 CFR 52.21 Prevention of Significant Deterioration (PSD) and 6 NYCRR Part 231 New Source Review (NSR) for New and Modified Facilities. It is subject to PSD and NSR Subpart 231-6 for Modifications to Existing Major Facilities within the Ozone Transport Region due to emissions of NO_x in excess of 250 tons per year, and is subject to PSD and NSR



Subpart 231-8 for Modifications to Existing Major Facilities in Attainment Areas due to potential emissions of SO₂ and total PM in excess of 250 tons per year each.

The new process will not trigger major New Source Review thresholds, BACT thresholds, or MACT thresholds [because the process formulations will not contain Hazardous Air Pollutants (HAP)].

Noncompliant VOC emissions from the coating process are controlled by an existing carbon adsorption system (located in the adjacent building).

The new process includes a rotary screen printing which is subject to the limited provisions in 6 NYCRR Part 234.1(b) because the actual annual VOC graphic arts emissions from the facility are less than 3 tons on a rolling 12- month basis.

The new process utilizes noncompliant cleaning solutions which will have a vapor pressure of greater than 1 mm of mercury, therefore a VOC Reasonably Available Control Technology (RACT) evaluation was provided with the application. The RACT analysis looked at solvent substitution, use of existing controls, and the technical and economic feasibility of new control technologies. The RACT analysis proposed measures to reduce VOC emissions during cleaning that include the use of tight fitting lids to be closed to the extent practicable. Controls on cleaning operation were not deemed to be technically and economically feasible. The permit therefore includes a RACT variance.

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: KIMBERLY A MERCHANT
 6274 EAST AVON-LIMA RD
 AVON, NY 14414-9519

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 8 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



Condition 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 8 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 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(585) 226-2466

New York State Department of Environmental Conservation

Permit ID: 8-2654-00064/01203

Facility DEC ID: 8265400064



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

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45 GLOVER AVE
NORWALK, CT 06850-1600

Facility: XEROX JOSEPH C WILSON CTR FOR TECHNOLOGY
800 PHILLIPS RD
WEBSTER, NY 14580

Authorized Activity By Standard Industrial Classification Code:
3861 - PHOTOGRAPH EQUIPMENT & SUPPLIES

Permit Effective Date: 06/16/2015

Permit Expiration Date: 06/15/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 2 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 3 6 NYCRR Subpart 201-7: Process Permissible Emissions

EU=C-0NC01,Proc=TF4

- 4 6 NYCRR 228-1.1 (a) (3): Once in always in
- 5 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 6 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 7 6 NYCRR 228-1.3 (b) (2): Compliance Demonstration
- 8 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 9 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 10 6 NYCRR 228-1.5 (c): Overall removal efficiency calculation
- 11 6 NYCRR 228-1.5 (c): Compliance Demonstration
- 12 6 NYCRR 228-1.6 (a): Compliance Demonstration
- 13 6 NYCRR 228-1.6 (c): Surface coating access for sampling
- 14 6 NYCRR 228-1.6 (d): Compliance Demonstration
- 15 6 NYCRR 228-1.6 (e): VOC content of gas stream test methods
- 16 6 NYCRR 228-1.6 (f) (3): Compliance Demonstration
- 17 6 NYCRR 228-1.6 (h): Compliance Demonstration

EU=C-0NC01,Proc=TF5

- *18 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 19 6 NYCRR 234.1 (c): Once in, always in
- 20 6 NYCRR 234.5: Compliance Demonstration
- 21 6 NYCRR 234.6: Compliance Demonstration
- 22 6 NYCRR 234.7: Compliance Demonstration
- 23 6 NYCRR 234.8: Compliance Demonstration

EU=C-0NC01,Proc=TF6

- 24 6 NYCRR Part 226: Compliance Demonstration
- 25 6 NYCRR 226.5: Compliance Demonstration

EU=C-0NC01,Proc=TF7

- 26 6 NYCRR 212.4 (c): Compliance Demonstration
- 27 6 NYCRR 212.6 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 28 ECL 19-0301: Contaminant List
- 29 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 30 6 NYCRR Subpart 201-5: Emission Unit Definition
- 31 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 32 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 33 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level



- 34 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 35 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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



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

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

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

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

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

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

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

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

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

Item J: Required Emission Tests - 6 NYCRR 202-1.1



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

- Item K: Open Fires Prohibitions - 6 NYCRR 215.2**
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.
- Item L: Permit Exclusion - ECL 19-0305**
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.
- Item M: Federally Enforceable Requirements - 40 CFR 70.6 (b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Non Applicable requirements



Effective between the dates of 06/16/2015 and 06/15/2025

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

Item 1.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6 NYCRR Part 231

Emission Unit: CONC01

Reason: Total actual emissions will be less than 50% of the applicability thresholds of 6 NYCRR Part 231.

Condition 2: Air pollution prohibited

Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 2.1:

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

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

Condition 3: Process Permissible Emissions

Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 3.1:

The sum of emissions from the regulated process cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: C-0NC01

Process: TF4

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 2.64 pounds per hour

23,103 pounds per year



Emission Unit: C-0NC01 Process: TF5
CAS No: 0NY998-00-0
Name: VOC
PTE(s): 5.67 pounds per hour
6,000 pounds per year

Emission Unit: C-0NC01 Process: TF6
CAS No: 0NY998-00-0
Name: VOC
PTE(s): 0.32 pounds per hour
2,772 pounds per year

Emission Unit: C-0NC01 Process: TF7
CAS No: 0NY998-00-0
Name: VOC
PTE(s): 0.87 pounds per hour
7,624 pounds per year

Condition 4: Once in always in
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR 228-1.1 (a) (3)

Item 4.1:

This Condition applies to Emission Unit: C-0NC01
Process: TF4

Item 4.2:

Any coating line that is or becomes subject to the provisions of Subpart 228-1 will remain subject to these provisions even if the annual potential to emit or actual emissions of VOCs for the facility later falls below the thresholds set forth in Subdivision 228-1.1(a).

Condition 5: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

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

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF4



Item 5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: 40 CFR 60 Appendix A, Method 9

Monitoring Frequency: SEMI-ANNUALLY

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

New York State Department of Environmental Conservation

Permit ID: 8-2654-00064/01203

Facility DEC ID: 8265400064



Condition 6: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

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

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01

Process: TF4

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025



Applicable Federal Requirement:6 NYCRR 228-1.3 (b) (2)

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF4

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners and operators of emission sources not subject to 6 NYCRR Part 228-1, as set forth in Paragraphs 228-1.1(b)(9) or (13), or those sources that are using coatings not subject to specific requirements of Part 228-1 as set forth in Paragraph 228-1.3(e)(2), or Clauses 228-1.4(b)(5)(iii)(e), 228-1.4(b)(5)(iii)(i) or 228-1.4(b)(5)(iv), must maintain records on an as used basis. The records must include the relevant regulatory citation of each exemption and quantity of coating used. If the exemption criteria are based on VOC usage, the records must contain calculations and supplier/manufacturer material data sheets for verification of VOC usage. All records required by this Paragraph must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Surface Coating- Prohibitions
Effective between the dates of 06/16/2015 and 06/15/2025

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

Item 8.1:

This Condition applies to Emission Unit: C-0NC01
Process: TF4

Item 8.2:

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be



applied to any part or product at an affected facility. This prohibition shall not apply to the following:

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

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

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

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

Condition 9: Surface Coating - Handling, storage and disposal
Effective between the dates of 06/16/2015 and 06/15/2025

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

Item 9.1:

This Condition applies to Emission Unit: C-0NC01
Process: TF4

Item 9.2:

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

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

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

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

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

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



- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
 - (i) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Condition 10: Overall removal efficiency calculation
Effective between the dates of 06/16/2015 and 06/15/2025

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

Item 10.1:

This Condition applies to Emission Unit: C-0NC01
Process: TF4

Item 10.2:

The overall removal efficiency of an air cleaning device used as a control strategy must be determined, for every surface coating formulation, on a solids as applied basis using Equation 2 unless a 90 percent or greater overall removal efficiency is achieved by the air cleaning device. The air cleaning device must be designed and operated to provide, at a minimum, an overall removal efficiency of either 90 percent or as determined by Equation 2.

$$\eta = \left[1 - \left[\frac{(\text{VOC})_c(V_n)_a}{(\text{VOC})_a(V_n)_c} \right] \right] \times 100 \quad \text{Equation 2}$$

Where:

η is the overall removal efficiency.



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

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

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

$$(V_n)_c = 1 - (V_v)_c \quad \text{Equation 3}$$

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



$$(V_v)_c = \left[\frac{(VOC)_c}{d_{voc}} \right]$$

Equation 4

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

$$(V_n)_a = 1 - (V_v)_a$$

Equation 5

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

$$(V_v)_a = \left[\frac{(VOC)_a}{d_{voc}} \right]$$

Equation 6

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

Condition 11: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025



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

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF4

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

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The overall removal efficiency of an air cleaning device used as a control strategy must be determined, for every surface coating formulation, on a solids as applied basis using Equation 2 unless a 90 percent or greater overall removal efficiency is achieved by the air cleaning device as determined by Equation 2 presented under an Optional Condition.

As per 6 NYCRR 228-1.3(b)(1), a facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 90 percent. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department. All records required by this condition must be maintained at the facility for a period of five years.

Parameter Monitored: VOC

Lower Permit Limit: 90 percent degree of air cleaning or greater

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

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

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF4

Item 12.2:

New York State Department of Environmental Conservation

Permit ID: 8-2654-00064/01203

Facility DEC ID: 8265400064



Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Reference Test Method: EPA Reference Test Method 311 or 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Surface coating access for sampling
Effective between the dates of 06/16/2015 and 06/15/2025

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

Item 13.1:

This Condition applies to Emission Unit: C-0NC01
Process: TF4

Item 13.2:

Representatives of the department must be permitted on the facility owner's property, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with the requirements of 6 NYCRR Part 228-1.

Condition 14: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

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

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF4



Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

When an owner and/or operator of a coating line utilizes control equipment to comply with permit requirements or regulations, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

(1) The overall removal efficiency may be made by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment.

(2) For any control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment. The approved VOC CE test methods are contained Part 228-1.6(d)(2) Table 'Approved VOC CE Test Methods'. Test methods 204 through 204F (M204 - M204F) are included in Appendix M of 40 CFR part 51 (see table 1, Section 200.9 of this Title). When the sampling and analysis methods by this paragraph are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

(3) Alternative CE protocols and test methods may be allowed if the data quality objective approach or lower confidence limit approach requirements are met in conjunction with the additional criteria set forth in the EPA guidance document entitled Guidelines for Determining Capture Efficiency (see table 1, Section 200.9 of Title III). The alternative CE protocols and test methods must be approved in advance by the department. Also, the multiple line testing procedures outlined in the above guidance document can be used to determine CE if the applicable criteria are satisfied. The multiple line testing CE protocols and test methods must be approved in advance by the department.

Parameter Monitored: DEGREE OF AIR CLEANING

Lower Permit Limit: 90 percent degree of air cleaning or greater

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 15: VOC content of gas stream test methods
Effective between the dates of 06/16/2015 and 06/15/2025**



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

Item 15.1:

This Condition applies to Emission Unit: C-0NC01
Process: TF4

Item 15.2:

The owner and/or operator of a surface coating line must follow the applicable notification requirements, protocol requirements, and test procedures of 6 NYCRR Part 202 for testing and monitoring. Depending on the conditions at the test site, one of the following methods from Appendix A of 40 CFR Part 60 (see Table 1 of 6 NYCRR Part 200.9) must be used when measuring the VOC content of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

- (1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;
- (2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or
- (3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

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

Condition 16: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR 228-1.6 (f) (3)

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF4

Item 16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

If a carbon adsorption unit is used as an air cleaning device, continuous monitors must be installed, periodically calibrated, and operated when the control equipment is operating. When VOC breakthrough occurs; immediate action must be taken to replace the carbon and restore control equipment to its proper operating condition.

New York State Department of Environmental Conservation

Permit ID: 8-2654-00064/01203

Facility DEC ID: 8265400064



Parameter Monitored: VOC
Monitoring Frequency: CONTINUOUS
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 17: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

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

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF4

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 18: Capping Monitoring Condition
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 18.1:

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

6 NYCRR 234.3 (e) (1) (i) ('a')

Item 18.2:

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

Item 18.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

New York State Department of Environmental Conservation

Permit ID: 8-2654-00064/01203

Facility DEC ID: 8265400064



Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 18.4:

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

Item 18.5:

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

Item 18.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01

Process: TF5

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 18.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The rotary screen printing process is exempt from the limits of 6 NYCRR Part 234.3 by limiting total VOC emissions from the process to less than 3 tpy.

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 19: Once in, always in

Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR 234.1 (c)

Item 19.1:

This Condition applies to Emission Unit: C-0NC01

Process: TF5



Item 19.2:

A printing process that is subject to the provisions of Part 234 will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.

Condition 20: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement: 6 NYCRR 234.5

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF5

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

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which a coating, ink or adhesive is to be applied to a substrate.

This prohibition shall not apply to the following:

(1) Ink, coating, or adhesive used in printing processes where control equipment has been installed to demonstrate compliance with this Part; or

(2) Ink, coating, or adhesive used in printing processes that have been granted variances for reasons of technological and economic feasibility per section 234.3(f) of this Part.

A person selling an ink, coating, or adhesive used in a printing process subject to this Part must, upon request, provide the buyer with certification of the VOC content of the coating, ink or adhesive supplied.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration



Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR 234.6

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF5

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

Item 21.2:

Compliance Demonstration 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: UPON REQUEST BY REGULATORY AGENCY

Condition 22: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR 234.7

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF5

Item 22.2:

Compliance Demonstration shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 8-2654-00064/01203

Facility DEC ID: 8265400064



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 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: UPON REQUEST BY REGULATORY AGENCY

Condition 23: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR 234.8

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01

Process: TF5

Item 23.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A person shall not cause or allow emissions having an average opacity of 10 percent or greater for any consecutive six minute period from any emission source subject to this Part into the outdoor atmosphere.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 24: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025



Applicable Federal Requirement:6 NYCRR Part 226

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01
Process: TF6

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

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

6NYCRR 226. Requirements for Cold Cleaning Degreasers
(Non 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. This does not apply to remote reservoir degreasers.
- (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.

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) 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).

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 1/30/2016.

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

Condition 25: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR 226.5

Item 25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01

Process: TF6

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 25.2:

Compliance Demonstration shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 8-2654-00064/01203

Facility DEC ID: 8265400064



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As proposed in the RACT variance request dated April, 2015 the standard control requirements of Part 226 will not apply. The vessels containing the cleaning solvent will be closed at all times except when screen printing rollers are being transferred in or out of the equipment. This variance will be reviewed and renewed, if needed, at least once every five years (standard Title V permit term).

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 26: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-ONC01

Process: TF7

Item 26.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with



the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site.

Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

Condition 27: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-0NC01

Process: TF7

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

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

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

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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 only enforceable.

Condition 28: Contaminant List
Effective between the dates of 06/16/2015 and 06/15/2025



Applicable State Requirement:ECL 19-0301

Item 28.1:

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

CAS No: 0NY998-00-0

Name: VOC

**Condition 29: Malfunctions and start-up/shutdown activities
Effective between the dates of 06/16/2015 and 06/15/2025**

Applicable State Requirement:6 NYCRR 201-1.4

Item 29.1:

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

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

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

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

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



Condition 30: Emission Unit Definition
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 30.1:

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

Emission Unit: C-ONC01

Emission Unit Description:

AMAT Pilot Plant web coating line and related process equipment utilized to apply uniform and patterned coatings to flexible web substrates.

Building(s): W119
W121
W130
W213

Condition 31: Renewal deadlines for state facility permits
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 31.1:

The owner or operator of a facility having an issued state facility 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.

Condition 32: Compliance Demonstration
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 32.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 32.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 8
6274 East Avon-Lima Rd.
Avon, NY 14414

New York State Department of Environmental Conservation

Permit ID: 8-2654-00064/01203

Facility DEC ID: 8265400064



Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 33: Visible Emissions Limited
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable State Requirement:6 NYCRR 211.2

Item 33.1:

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

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

Condition 34: Emission Point Definition By Emission Unit
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 34.1:

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

Emission Unit: C-0NC01

Emission Point: 0BB15

Height (ft.): 85 Diameter (in.): 30
NYTMN (km.): 4788.422 NYTME (km.): 303.729 Building: W119

Emission Point: 0BB39

Height (ft.): 41 Diameter (in.): 30
NYTMN (km.): 4788.715 NYTME (km.): 304.258 Building: W119

Emission Point: 0DD01

Height (ft.): 60 Length (in.): 24 Width (in.): 16
NYTMN (km.): 4788.715 NYTME (km.): 304.258 Building: W121

Emission Point: 0DD11

Height (ft.): 60 Length (in.): 24 Width (in.): 24
NYTMN (km.): 4788.715 NYTME (km.): 304.258 Building: W121

Emission Point: 0E108

Height (ft.): 48 Diameter (in.): 48
NYTMN (km.): 4788.715 NYTME (km.): 304.258 Building: W130

Condition 35: Process Definition By Emission Unit
Effective between the dates of 06/16/2015 and 06/15/2025

Applicable State Requirement:6 NYCRR Subpart 201-5



Item 35.1:

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

Emission Unit: C-0NC01
Process: TF4 Source Classification Code: 4-02-013-01
Process Description:
Solvent based surface coating on flexible web using extrusion and gravure application methods. Located in total enclosure controlled by carbon adsorption. Coatings do not contain HAPs or are otherwise exempt from 40 CFR 63.3280 (Subpart JJJJ).

Emission Source/Control: KAD01 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CDD11 - Process

Item 35.2:

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

Emission Unit: C-0NC01
Process: TF5 Source Classification Code: 4-02-013-01
Process Description:
Rotary screen printing, application of patterned coatings on flexible web, dried/cured to establish desired properties.

Emission Source/Control: CDD11 - Process

Item 35.3:

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

Emission Unit: C-0NC01
Process: TF6 Source Classification Code: 4-02-013-05
Process Description:
Solvent metal cleaning of rotary screens from process TF5.

Emission Source/Control: RSC01 - Process

Item 35.4:

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

Emission Unit: C-0NC01
Process: TF7 Source Classification Code: 4-02-013-03
Process Description:
Ancillary operations for processes TF4 and TF5 and inkjet printing.

Emission Source/Control: INKJT - Process



Emission Source/Control: MX130 - Process

Emission Source/Control: RSC02 - Process

