

**New York State Department of Environmental Conservation  
Facility DEC ID: 9140200574**



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-1402-00574/00023  
Mod 0 Effective Date: 02/11/2000 Expiration Date: No expiration date.  
Mod 2 Effective Date: 11/19/2003 Expiration Date: No expiration date.  
Mod 3 Effective Date: 01/08/2007 Expiration Date: No expiration date.

Permit Issued To: FLEXO TRANSPARENT INC  
28 WASSON STREET  
BUFFALO, NY 14210-1547

Contact: RONALD D MABRY  
FLEXOTRANSPARENT INC  
28 WASSON ST  
BUFFALO, NY 14240  
(716) 825-7710

Facility: FLEXO-TRANSPARENT INC  
28 WASSON STREET  
BUFFALO, NY 14210

Contact: RONALD D MABRY  
FLEXOTRANSPARENT INC  
28 WASSON ST  
BUFFALO, NY 14240  
(716) 825-7710

**Description:**

Flexo Transparent, Inc. (Flexo) is a commercial flexographic printing facility which specializes in the printing of flexible packaging products for the personal care, medical, food, consumer products and produce industries. Operations at this facility include flexographic printing and converting, laminating, slitting, rewinding, and heat sealing of plastic film.

This permit modification establishes a new volatile organic compounds (VOC) emission cap of less than 45 tons per year (tpy) for emission unit 1-PRINT. This emission unit previously had a VOC emission cap of 15 tpy established in the initial issuance of this permit in 2000. That cap was accepted by Flexo after they certified and sold 42 tpy of VOC Emission Reduction Credits (ERCs) created by overcontrolling VOC emissions from emission unit 1-PRINT. Flexo exceeded the 15 tpy VOC cap, however, in 2004. Enforcement action by the Department required Flexo, in addition to other punitive measures, to purchase VOC ERCs with a 1.15:1 offset ratio to allow reestablishment of the original 45



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tpy VOC emission cap. The purchase of 45.21 tpy VOC ERCs was completed in March, 2005, and this permit modification formally imposes the 45 tpy VOC emission cap for emission unit 1-PRINT.

Flexo is required to calculate their actual VOC emissions monthly and to track their annual emissions on a 12-month rolling total basis. Flexo must submit to the Department an annual emission cap report each calendar year.

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:           DAVID S DENK  
  DIVISION OF ENVIRONMENTAL PERMITS  
  270 MICHIGAN AVE  
  BUFFALO, NY 14203-2999

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



**Notification of Other State Permittee Obligations**

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

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

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

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

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

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

Facility Inspection by the Department  
Relationship of this Permit to Other Department Orders and Determinations  
Applications for permit renewals, modifications and transfers  
Applications for Permit Renewals and Modifications  
Permit modifications, suspensions or revocations by the Department  
Applications for Permit Renewals and Modifications  
Permit Modifications, Suspensions and Revocations by the Department  
Permit Modifications, Suspensions, and Revocations by the Department

**Facility Level**

Submission of Applications for Permit Modification or Renewal -REGION 9  
HEADQUARTERS  
Submission of application for permit modification or renewal-REGION 9  
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 3-1: Applications for permit renewals, modifications and transfers**  
**Applicable State Requirement: 6NYCRR 621.11**

**Item 3-1.1:**

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

**Item 3-1.2:**

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

**Item 3-1.3:**

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



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actual transfer of ownership.

**Condition 2-1: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 2-1.1:**

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

**Item 2-1.2:**

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

**Item 2-1.3:**

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 3-2: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 3-2.1:**

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

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

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

**Expired by Mod No: 2**

**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:**



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

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

**Item 2-2.1:**

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

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

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

**Expired by Mod No: 2**

**Item 4.1:**

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

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

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

**Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS**  
**Applicable State Requirement: 6NYCRR 621.5(a)**

**Item 5.1:**

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

NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits



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270 Michigan Avenue  
Buffalo, NY 14203-2999  
(716) 851-7165

**Condition 3-3: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS**  
**Applicable State Requirement: 6NYCRR 621.6(a)**

**Item 3-3.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2999  
(716) 851-7165

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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: FLEXO TRANSPARENT INC  
28 WASSON STREET  
BUFFALO, NY 14210-1547

Facility: FLEXO-TRANSPARENT INC  
28 WASSON STREET  
BUFFALO, NY 14210

Authorized Activity By Standard Industrial Classification Code:  
2751 - COMMERCIAL PRINTING LETTERPRESS(1977)

Mod 0 Permit Effective Date: 02/11/2000

Permit Expiration Date: No expiration date.

Mod 2 Permit Effective Date: 11/19/2003

Permit Expiration Date: No expiration date.

Mod 3 Permit Effective Date: 01/08/2007

Permit Expiration Date: No expiration date.



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 2 6NYCRR 200.3: False statement
- 3-1 6NYCRR 201-7.1: Facility Permissible Emissions

**Emission Unit Level**

**EU=1-PRINT**

- 17 6NYCRR 201-1.4: Compliance Demonstration
- \*3-2 6NYCRR 201-7.1: Capping Monitoring Condition
- 25 6NYCRR 234.3(e): control requirement
- 3-4 6NYCRR 234.4(a)(2): Compliance Demonstration
- 2-10 6NYCRR 234.4(b)(1): control requirement
- 27 6NYCRR 234.4(b)(2): control requirement
- 3-3 6NYCRR 234.4(b)(3): Compliance Demonstration
- 28 6NYCRR 234.4(b)(3): Compliance Demonstration
- 2-11 6NYCRR 234.4(b)(4): sampling
- 3-5 6NYCRR 234.4(b)(4): Compliance Demonstration
- 3-6 6NYCRR 234.4(b)(4): Compliance Demonstration
- 3-7 6NYCRR 234.4(b)(4): Compliance Demonstration
- 3-8 6NYCRR 234.4(c)(2): Compliance Demonstration
- 2-15 6NYCRR 234.6: Handling, storage, and disposal of volatile organic compounds

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 2-18 ECL 19-0301: Contaminant List
- 2-19 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 33 6NYCRR 201-5: Emission Unit Definition
- 35 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

- 38 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 39 6NYCRR 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 - 6NYCRR Part 200.5**

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

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

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

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

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

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

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

Any person who owns or operates an air contamination

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

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

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

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

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

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

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event



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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 - 6NYCRR Part 201-1.7**

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

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

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

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

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

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific



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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 Part 202-1.1**

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

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

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

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

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

**Item M: 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



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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 N: 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 2: False statement**  
**Effective between the dates of 02/11/2000 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 200.3**

**Item 2.1:**

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

**Condition 3-1: Facility Permissible Emissions**  
**Effective between the dates of 01/08/2007 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-7.1**

**Item 3-1.1:**

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0 (From Mod 3) PTE: 90,000 pounds per year

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Name: VOC

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

**Condition 17: Compliance Demonstration**

**Effective between the dates of 02/11/2000 and Permit Expiration Date**

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

**Item 17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with the unavoidable excess emission requirements specified in 6NYCRR Part 201-1.4, FlexoTransparent has developed a procedure to be followed during malfunctions resulting in excess emissions. The procedures will provide sufficient information to demonstrate the following:

1. The excess emissions were caused by a sudden, unavoidable breakdown of technology, beyond the control of the owner or operator;
2. The excess emissions : (a) did not stem from any activity or event that could have been foreseen and avoided, and (b) could not have been avoided by better operation and maintenance practices;
3. Repairs were made in an expeditious fashion when the operator knew or should have known that applicable emission limitations were being exceeded. Off-shift labor and overtime must have been utilized, to the extent practicable, to ensure that such repairs were made as expeditiously as practicable;
4. The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions;

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5. All possible steps were taken to minimize the impact of the excess emissions on ambient air quality;
6. The owner or operator's actions in response to the excess emissions were properly documented;
7. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and
8. The owner or operator properly and promptly notified the appropriate regulatory authority.

In addition to maintaining records to prove the above criteria, FlexoTransparent will also maintain records of estimated VOC emissions caused during a malfunction. The emission estimations will be documented as indicated in the permit application. Most importantly, FlexoTransparent must add the unavoidable, excess emissions to the monthly emission records to demonstrate compliance with the rolling 12-month 15 tpy emission limit.

FlexoTransparent maintains an audible alarm on the catalytic oxidizer which will activate if the control system fails. In addition, FlexoTransparent maintains a visual alarm system to indicate proper operation of the catalytic oxidizer. The visual alarm system is separate from the control panel lights and is positioned such that upon entrance into the press room it can be determined whether or not the oxidizer is operating. The red light indicates the oxidizer is not operating and a yellow light indicates it is operating.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 3-2: Capping Monitoring Condition**

**Effective between the dates of 01/08/2007 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-7.1**

**Item 3-2.1:**

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:

6NYCRR 201-6.1(a)



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**Item 3-2.2:**

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

**Item 3-2.3:**

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

**Item 3-2.4:**

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 3-2.5:**

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 3-2.6:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 3-2.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

This permit modification establishes a new volatile organic compounds (VOC) emission cap of less than 45 tons per year (tpy) for emission unit 1-PRINT, which includes four presses (designated as emission sources 00MAF, 0MAF8, KIDDE, & NMAF6). The facility utilizes a permanent total enclosure capture system within the press room, achieving 100% capture efficiency. The facility will limit potential VOC emissions from emission unit 1-PRINT to less than 45 tpy for purposes of capping out of the major facility definition per 6NYCRR Part 201-6.1(a).

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The actual VOC emissions shall be calculated based on the usage of ink, varnish, adhesive, solvent, and other VOC containing products; the VOC content of the products; and the destruction efficiency of the oxidizer as determined by actual source testing. The general accuracy of the emission calculations shall be verified by maintaining pertinent records including, but not limited to: purchase and/or production records, VOC content of products, and hours of operation. All records with corresponding emission calculations shall be kept on-site for a minimum of five years. This information shall be made available to the Department on request.

Flexo will not exceed an emission rate of 45 tons of VOCs per 12 month period for emission unit 1-PRINT. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

$$\text{VOC}(1\text{-PRINT}) = [\text{VOC}(\text{es}) \times (1\text{-DE})] + \text{VOC}(\text{down time}) + \text{VOC}(\text{fugitive})$$

where,

VOC(es) = VOC emissions generated by each emission source (designated as emission sources 00MAF, 0MAF8, KIDDE, & NMAF6) associated with each specific oxidizer.

DE = destruction efficiency of specific oxidizer as measured during performance testing on September 21, 2005. For the MEGTEC oxidizer (designated emission source/control device 00TEC), the DE = 99%. For the M&W oxidizer (designated emission source/control device 00OXY), the DE = 84%.

VOC(down time) = unoxidized VOC emissions released to the environment during oxidizer down times.

VOC(fugitive) = estimated VOC losses that are released to the environment through the facility's ventilation system.

The facility shall submit to the Department an annual emission cap report for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each

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rolling 12-month period throughout the calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 45 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

**Condition 25: control requirement**

**Effective between the dates of 02/11/2000 and Permit Expiration Date**

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

**Item 25.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 25.2:**

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

**Condition 3-4: Compliance Demonstration**

**Effective between the dates of 01/08/2007 and Permit Expiration Date**

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

**Item 3-4.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 3-4.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Flexo-Transparent Inc. must assure compliance with the minimum overall VOC removal efficiency rate of 60% for the capture and control devices. The overall VOC removal



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efficiency consists of two components and is calculated as the product of the capture efficiency of the gas collection system and the destruction efficiency of the control equipment.

The overall VOC removal efficiency was verified via performance testing for destruction efficiency and permanent total enclosure (PTE). The performance test determining the destruction efficiency of the oxidizer was performed, in accordance with 40CFR60, Appendix A, Method 18, 25 or 25A, on September 21, 2005. This test shall be repeated at least once every five years, based on the date of the previous test. The capture efficiency was determined by testing the PTE system of the press room in accordance with 40CFR60, Appendix A, Method 204, on September 21, 2005. The PTE testing need only be repeated if physical changes to the press room occur.

Continuous compliance with the 60% overall removal efficiency will be assured by: (1) maintaining permanent total enclosure in the press room at all times during press operation, (2) maintaining the destruction efficiency of the oxidizer by performing all manufacturer recommended maintenance, and (3) assuring proper operation of the oxidizer at all times during press operation.

Lower Permit Limit: 60 percent reduction by weight  
Reference Test Method: EPA Method 18, 25, 25A, 204  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-10: control requirement**

**Effective between the dates of 11/19/2003 and Permit Expiration Date**

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

**Item 2-10.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 2-10.2:**

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



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

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

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

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

**Condition 27: control requirement**

**Effective between the dates of 02/11/2000 and Permit Expiration Date**

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

**Item 27.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 27.2:**

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

**Condition 3-3: Compliance Demonstration**

**Effective between the dates of 01/08/2007 and Permit Expiration Date**

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

**Item 3-3.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 3-3.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks,



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volatile organic compounds (VOC) and solvents must be maintained in a format acceptable to the department's representative, and upon request, these records must be submitted to the department's representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the department's representative in a format acceptable to the Department. Records must be maintained at the facility for a period of five years.

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

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

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

Upon written request from the Department, Flexo-Transparent Inc. shall report or make available monthly recordkeeping to demonstrate compliance.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 28: Compliance Demonstration**

**Effective between the dates of 02/11/2000 and Permit Expiration Date**

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

**Item 28.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 28.2:**

Compliance Demonstration shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks, VOC, and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the department's representative. Records must be maintained at the facility for a period of five years.

In accordance with the permit conditions specified under 6NYCRR Part 231-2.12, FlexoTransparent must prepare rolling 12-month VOC emission records. These records also satisfy the requirements of this regulation. For details regarding the records, refer to the permit condition for 6NYCRR Part 231-2.12.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-11: sampling**

**Effective between the dates of 11/19/2003 and Permit Expiration Date**

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

**Item 2-11.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 2-11.2:**

The results of any analysis or other procedure used for establishing compliance must be provided to the commissioner's representative. Representatives of the department shall be permitted, during reasonable business hours, to obtain ink and/or fountain solution samples for the purpose of determining compliance with 6NYCRR Part 234.

**Condition 3-5: Compliance Demonstration**

**Effective between the dates of 01/08/2007 and Permit Expiration Date**

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

**Item 3-5.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

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**Item 3-5.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

FlexoTransparent, Inc. is required to operate and maintain each oxidizer in accordance with manufacturer recommendations. FlexoTransparent shall perform the daily, weekly, monthly, semi-annual, and annual maintenance activities as specified by the manufacture. FlexoTransparent shall maintain records of these maintenance procedures. The records shall be kept on-site and be made available for review upon request by the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 3-6: Compliance Demonstration**

**Effective between the dates of 01/08/2007 and Permit Expiration Date**

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

**Item 3-6.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 3-6.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

FlexoTransparent, Inc. is required to inspect the catalyst beds of each oxidizer for settling of catalyst material. Each catalyst bed shall be inspected every six (6) months of operation. The inspection shall include checking for cracks, catalyst leakage through screens, and catalyst dust buildup downstream from the beds. Any beds that are not full should be filled with new catalyst.

In addition, the catalyst material shall be inspected for



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smaller than normal, pure white beads. These beads are no longer functional since the active metals have been rubbed away. Any beds that contain over 50 percent of the uncoated beads, should be refilled with new catalyst.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 3-7: Compliance Demonstration**

**Effective between the dates of 01/08/2007 and Permit Expiration Date**

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

**Item 3-7.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 3-7.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

FlexoTransparent, Inc. is required to remove a sample of the catalyst from each oxidizer and send the sample for analysis. The analysis shall be completed on an annual basis. The samples shall be collected and analyzed as specified by the manufacturer. The results shall be kept on-site and made available for review upon request by the Department.

Parameter Monitored: CATALYST

Upper Permit Limit: 1 items

Monitoring Frequency: ANNUALLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 3-8: Compliance Demonstration**

**Effective between the dates of 01/08/2007 and Permit Expiration Date**

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



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**Item 3-8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 3-8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Continuous monitors to measure the temperature rise across the catalytic incinerator bed must be installed, periodically calibrated, and operated at all times the associated control equipment is operating. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. FlexoTransparent shall maintain continuous recording charts of the bed temperature. The continuous chart recordings and the calibration data shall be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-15: Handling, storage, and disposal of volatile organic compounds**

**Effective between the dates of 11/19/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 234.6**

**Item 2-15.1:**

This Condition applies to Emission Unit: 1-PRINT

**Item 2-15.2:**

The following is prohibited:

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

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

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



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



**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 - 6NYCRR Part 201-1.10(a)**

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1) , and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

**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

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law.

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 2-18: Contaminant List**

**Effective between the dates of 11/19/2003 and Permit Expiration Date**

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

**Item 2-18.1:**

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 2-19: Unavoidable noncompliance and violations**

**Effective between the dates of 11/19/2003 and Permit Expiration Date**

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

**Item 2-19.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

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

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the



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facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

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

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 33: Emission Unit Definition**

**Effective between the dates of 02/11/2000 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 33.1(From Mod 3):**

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

Emission Unit: 1-PRINT

Emission Unit Description:

Emission Unit 1-PRINT consists of four printing presses, two solvent cleaning tanks, and other related activities used for packaging flexographic printing onto plastic film, paper, or cloth. Flexography is a rotary web letterpress printing technique. It is the application of words or pictures to a substrate by means of a relief technique in which the image area is raised above the non-image area. Image plates are mounted to cylinders with adhesives. Ink is applied to these image carriers which are made of rubber or other elastomeric material. The ink image is then transferred from the flexible plate to the substrate.

These presses use alcohol based solvent inks which may have higher than 75% VOC content when applied. Press dryers are an important part of the process to cause the ink to dry fast enough to make the process economically viable. The add-on emission control strategy used in the



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solvent-based flexographic printing operation is catalytic oxidation. The catalytic oxidation process relies on a catalyst operating at the proper temperatures to convert the organic vapors to carbon dioxide and water. The flexographic printing process is operated in a permanent total enclosure which obtains a 100% capture efficiency of the organic vapors.

Building(s): PRESS

**Condition 35: Air pollution prohibited**  
**Effective between the dates of 02/11/2000 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 35.1:**

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 38: Emission Point Definition By Emission Unit**  
**Effective between the dates of 02/11/2000 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 38.1(From Mod 2):**

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

Emission Unit: 1-PRINT

Emission Point: 00098

Height (ft.): 20

Diameter (in.): 46

Emission Point: 00099

Height (ft.): 20

Diameter (in.): 46

Building: PRESS

**Condition 39: Process Definition By Emission Unit**  
**Effective between the dates of 02/11/2000 and Permit Expiration Date**

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**Applicable State Requirement: 6NYCRR 201-5**

**Item 39.1(From Mod 3):**

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

Emission Unit: 1-PRINT

Process: 001

Process Description:

Emission Unit 1-PRINT, Process 001, consists of packaging flexographic printing onto plastic film, cloth, or paper. The five printing presses are identified as C414, MAF, KIDDE, C410, and HS6.

Emission Source/Control: 00OXY - Control

Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00TEC - Control

Control Type: CATALYTIC OXIDATION

Emission Source/Control: 00MAF - Process

Emission Source/Control: 0MAF8 - Process

Emission Source/Control: KIDDE - Process

Emission Source/Control: NMAF6 - Process