



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 9-1402-00574/00026  
Effective Date: 02/11/2014 Expiration Date: 02/10/2019

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 ST  
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 located in the City of Buffalo, Erie County. This permit incorporates operations permitted within two separate previously issued Air State Facility (ASF) permits issued in 2000 (for the entire facility in existence at that time) and in 2007 (which allowed the construction and operation of a new 10-color press and regenerative thermal oxidizer (RTO).) Flexo is subject to the Title V permitting requirements stated in 6NYCRR Part 201-6 for major facilities.

The facility is organized into one emission unit, U-PRINT, which includes five flexographic printers, two catalytic oxidizers, one RTO, two corona surface treaters, one solventless laminator, one ozone destruction unit, and one cold cleaning degreaser dip tank which is covered and vented to an oxidizer. The dip tank is subject to certain requirements of 6NYCRR Part 226. The corona surface treaters and laminator exhaust to the ozone destruction unit which in turn exhausts to the RTO. The presses are located within an area certified as a



Permanent Total Enclosure which by definition provides 100% capture of VOC emissions from the presses and routing of those emissions to one of the oxidizers.

The facility will limit VOC emissions to comply with two separate, previously accepted VOC emission caps. A 45 tpy VOC emission cap applies to four presses (designated as emission sources 00MAF, 0MAF8, KIDDE, & NMAF6) which were the existing emission sources at the time the original ASF permit was issued. This cap was established to limit the facility's VOC emissions below the major source threshold of 50 tpy VOC per 6NYCRR Part 201-6. A 49 tpy VOC emission cap applies to the newest press (designated as emission source 0FK10). This cap was established in the second ASF permit to limit the source's VOC emissions below the major project status of 6NYCRR Part 231-2. Both of the caps are included in this Title V permit which supersedes the two ASF permits.

The oxidizers control the VOC emissions from the flexographic printing presses in accordance with 6NYCRR Part 234. Flexo is required to operate the flexographic printing process such that the capture system and the air cleaning devices provide for an overall reduction in VOC emissions of at least 65% for the four older presses, and at least 75% for the newest press. Since an overall reduction in VOC emissions of 65% from any of the four older presses (00MAF, KIDDE, 0MAF8 & NMAF6) does not limit actual emissions to less than the 45 tpy emission cap, a greater overall VOC removal efficiency of 81% is required based on the maximum VOC usage of 234 tpy for any of the four older presses. Similarly, since an overall reduction in VOC emissions of 75% from press 0FK10 does not limit actual emissions to less than the 49 tpy emission cap, a greater overall VOC removal efficiency of 79% is required based on the maximum VOC usage of 234 tpy for the press.

Flexo is required to conduct performance testing of the oxidizers (to determine destruction efficiency) once every five years to assure compliance with the 79% and 81% overall VOC reduction requirements.

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.

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 an overall VOC capture and destruction



efficiency as determined by actual source testing. Flexo will not exceed an emission rate of 49 tons of VOCs per 12 month period for the emissions generated by emission source 0FK10, nor 45 tons of VOCs per 12 month period for the emissions generated by emission sources 00MAF, 0MAF8, KIDDE & NMAF6. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period.

Flexo is subject to 40CFR63, Subpart KK Printing and Publishing as an area source. Flexo must verify that the facility' emissions of Hazardous Air Pollutants (HAPs) are less than 25 tons per year for total HAPs and less than 10 tons per year for any individual HAP. Flexo is required to calculate their actual HAP emissions monthly and track their annual HAP emissions on a 12-month rolling total basis. Flexo must submit to the Department an annual HAP emission report each calendar year.

Flexo is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), since the facility has potential pre-control device VOC emissions greater than 50 tons per year, which is the major source threshold level, and a control device is used to achieve compliance with an emission standard. This rule required Flexo to submit a CAM Plan which detailed and justified the monitoring indicators and performance criteria used at the facility to assure proper operation of the control device.

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 14203-2915

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 9 HEADQUARTERS



**DEC GENERAL CONDITIONS**

**\*\*\*\* General Provisions \*\*\*\***

**For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.**

**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

The permittee must submit a 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 9 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 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2915  
(716) 851-7165

**New York State Department of Environmental Conservation**

Permit ID: 9-1402-00574/00026

Facility DEC ID: 9140200574



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

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

**IDENTIFICATION INFORMATION**

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28 WASSON STREET  
BUFFALO, NY 14210-1547

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

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

Permit Effective Date: 02/11/2014

Permit Expiration Date: 02/10/2019



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (a) (7): Fees
- 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance  
Monitoring
- 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and  
Measurement
- 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected  
Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR 201-1.4 (a): Compliance Certification
- 22 6 NYCRR Subpart 201-6: Emission Unit Definition
- 23 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 24 6 NYCRR 201-7.1: Facility Permissible Emissions
- \*25 6 NYCRR 201-7.1: Capping Monitoring Condition
- \*26 6 NYCRR 201-7.1: Capping Monitoring Condition
- 27 6 NYCRR 211.1: Air pollution prohibited
- 28 6 NYCRR Part 226: Compliance Certification
- 29 6 NYCRR 234.3 (a) (1) (ii) ('b'): Compliance Certification
- 30 6 NYCRR 234.3 (a) (1) (ii) ('d'): Compliance Certification
- 31 6 NYCRR 234.4 (a): Compliance Certification
- 32 6 NYCRR 234.4 (a): Compliance Certification
- 33 6 NYCRR 234.4 (a): Compliance Certification
- 34 6 NYCRR 234.4 (a): Compliance Certification
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- 36 6 NYCRR 234.4 (c): Compliance Certification
- 37 6 NYCRR 234.4 (c): Compliance Certification
- 38 6 NYCRR 234.4 (c): Compliance Certification
- 39 6 NYCRR 234.4 (c): Compliance Certification
- 40 6 NYCRR 234.6: Compliance Certification
- 41 6 NYCRR 234.7: Compliance Certification
- 42 6 NYCRR 234.8: Compliance Certification
- 43 40CFR 63.820(a)(2), Subpart KK: Compliance Certification



44 40CFR 63.829(d), Subpart KK: Compliance Certification

45 40 CFR Part 64: Compliance Certification

**Emission Unit Level**

46 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit

47 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

48 ECL 19-0301: Contaminant List

49 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

50 6 NYCRR 211.2: Visible Emissions Limited

NOTE: \* preceding the condition number indicates capping.



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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is



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

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

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

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

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

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

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

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



(NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item M:** **Federally Enforceable Requirements - 40 CFR 70.6 (b)**  
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.**

**Condition 1: Acceptable Ambient Air Quality**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 200.6**

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

**Condition 2: Fees**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)**

**Item 2.1:**  
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

**Condition 3: Recordkeeping and Reporting of Compliance Monitoring**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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



**Item 3.1:**

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

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

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

**Condition 4: Records of Monitoring, Sampling, and Measurement  
Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (2)**

**Item 4.1:**

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

**Condition 5: Compliance Certification  
Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)**

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



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

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

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill



Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

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

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2014.  
Subsequent reports are due every 6 calendar month(s).



**Condition 6: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
  - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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

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

The address for the RAPCE is as follows:

NYSDEC Region 9 Headquarters  
270 Michigan Avenue  
Buffalo, NY 14203-2915

The address for the BQA is as follows:

NYSDEC  
Bureau of Quality Assurance  
625 Broadway  
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2015.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

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

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Albany NY 12233-3251

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

**Condition 8: Recordkeeping requirements**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 8.1:**

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

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

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

**Condition 9: Open Fires - Prohibitions**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 215.2**

**Item 9.1:**

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

**Item 9.2**

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

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.



- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.**

**[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]**

**Condition 10: Maintenance of Equipment**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 10.1:**

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

**Condition 11: Recycling and Salvage**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 201-1.7**

**Item 11.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.



**Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air**

**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 201-1.8**

**Item 12.1:**

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

**Condition 13: Exempt Sources - Proof of Eligibility**

**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 13.1:**

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

**Condition 14: Trivial Sources - Proof of Eligibility**

**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 14.1:**

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

**Condition 15: Requirement to Provide Information**

**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 15.1:**

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

**Condition 16: Right to Inspect**



**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)**

**Item 16.1:**

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

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

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

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

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

**Condition 17: Off Permit Changes**

**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 17.1:**

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

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

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

**Condition 18: Required Emissions Tests**

**Effective between the dates of 02/11/2014 and 02/10/2019**



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

**Item 18.1:**

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

**Condition 19: Accidental release provisions.**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 19.1:**

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

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
  - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
  - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

**Condition 20: Recycling and Emissions Reduction**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 20.1:**

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

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

**Condition 21: Compliance Certification**



Effective between the dates of 02/11/2014 and 02/10/2019

Applicable Federal Requirement:6 NYCRR 201-1.4 (a)

**Item 21.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 21.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Flexo-Transparent Inc. (Flexo) will continue to implement the written Startup, Shutdown, and Malfunction Plan (SSM Plan) which was developed by Flexo and approved by the Department via letter dated August 16, 2007. The SSM Plan describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard.

The purpose of the SSM Plan is to:

- (A) Ensure that, at all times, the owner or operator operates and maintains each affected source, including associated air pollution control and monitoring equipment, in a manner which satisfies the general duty to minimize emissions; and
- (B) Ensure that owners or operators are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 22: Emission Unit Definition**

Effective between the dates of 02/11/2014 and 02/10/2019

Applicable Federal Requirement:6 NYCRR Subpart 201-6

**Item 22.1:**

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

Emission Unit: U-PRINT

Emission Unit Description:

Four (4) wide-web and one (1) 10-color flexographic printing presses used for applying colored inks onto



flexible packaging materials. The presses vent through one of three oxidizers, two of which are catalytic oxidizers and one is a regenerative thermal oxidizer. Two (2) corona surface treaters are associated with a solventless laminator and are vented through a ozone destruction system utilizing catalytic reduction. There is also a cold cleaning degreaser dip tank which is covered and vented to an oxidizer.

Building(s): PRESS

**Condition 23: Progress Reports Due Semiannually**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 23.1:**

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

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

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

**Condition 24: Facility Permissible Emissions**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 24.1:**

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  
Name: VOC

PTE: 188,000 pounds per year

**Condition 25: Capping Monitoring Condition**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 25.1:**

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:





thresholds of 6NYCRR Part 231-2 New Source Review. The facility utilizes a permanent total enclosure capture system within the press room, achieving 100% capture efficiency.

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 an overall VOC capture and destruction efficiency 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 49 tons of VOCs per 12 month period for emission source 0FK10. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

$$\text{VOC}(0\text{FK}10) = [\text{VOC}(0\text{FK}10) \times (1-\text{CDE})]$$

where,

$\text{VOC}(0\text{FK}10)$  = VOC emissions generated by Press F&K10, designated emission source 0FK10.

CDE = overall capture and destruction efficiency of the specific oxidizer system as measured during the most recent performance testing.

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 rolling 12-month period throughout the calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 49 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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



**Condition 26: Capping Monitoring Condition**  
Effective between the dates of 02/11/2014 and 02/10/2019

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

**Item 26.1:**

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 201-6.1 (a) (1)

**Item 26.2:**

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

**Item 26.3:**

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 26.4:**

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 26.5:**

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 26.6:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-PRINT

Process: 00A

Emission Source: 00MAF

Emission Unit: U-PRINT

Process: 00A

Emission Source: 0MAF8

Emission Unit: U-PRINT

Process: 00A

Emission Source: KIDDE

Emission Unit: U-PRINT

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Process: 00A

Emission Source: NMAF6

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 26.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Flexo-Transparent Inc. (Flexo) will limit volatile organic compounds (VOC) emissions from four presses (designated as emission sources 00MAF, 0MAF8, KIDDE, & NMAF6) to less than 45 tons per year (tpy). This emission limit was imposed on Flexo in the facility Air State Facility Permit issued on January 8, 2007 for purposes of capping the facility under the major source thresholds of 6NYCRR Part 201-6. The facility utilizes a permanent total enclosure capture system within the press room, achieving 100% capture efficiency.

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 an overall VOC capture and destruction efficiency 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 sources 00MAF, 0MAF8, KIDDE, & NMAF6. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

$$\text{VOC}(4 \text{ presses}) = [\text{VOC}(\text{es}) \times (1-\text{CDE})]$$

where,

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

CDE = overall capture and destruction efficiency of the specific oxidizer system as measured during the most recent performance testing.

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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 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 MINIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 27: Air pollution prohibited**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 27.1:**

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.

**Condition 28: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR Part 226**

**Item 28.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PRINT

Process: 00C

**Item 28.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for Cold Cleaning Degreasers

A. Equipment Specifications



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

- (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 solvent with a vapor pressure of 1.0 mm Hg, or less, at 20°C., 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.  
(8) Include in the semiannual monitoring report and annual compliance certifications (required of all permittees subject to Title V) the solvent consumption required under (5) above, as well as a statement that the permittee's obligations under items (1) through (7) above have been met for the period of the report or certification.. This statement must be based on the permittee's observations on a daily basis that the operation of the solvent metal cleaning process has met the above criteria. The permittee must maintain a log of instances when the above have not been met, and such statement must summarize these instances.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 29: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 29.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PRINT Process: 00A	Emission Source: 00MAF
Emission Unit: U-PRINT Process: 00A	Emission Source: 00OXY
Emission Unit: U-PRINT Process: 00A	Emission Source: 00RTO
Emission Unit: U-PRINT Process: 00A	Emission Source: 00TEC
Emission Unit: U-PRINT Process: 00A	Emission Source: 0MAF8
Emission Unit: U-PRINT Process: 00A	Emission Source: KIDDE



Emission Unit: U-PRINT  
Process: 00A

Emission Source: NMAF6

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

**Item 29.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This condition applies to the presses identified as 00MAF, KIDDE, 0MAF8, & NMAF6 when emissions are routed to the either of the catalytic oxidizers identified as 00OXY & 00TEC or the regenerative thermal oxidizer identified as 00RTO.

As specified in 6NYCRR Part 234.3(a)(1)(ii)(b), where a flexographic printing process is employed, the capture system and the air cleaning device must provide for an overall reduction in volatile organic compound (VOC) emissions of at least 65 percent for a printing process that was first installed prior to March 14, 1995, and that is controlled by an add-on capture system and air cleaning equipment that was first installed prior to July 8, 2010. The overall removal 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 individual VOC potential-to-emit (PTE) of any of the presses (00MAF, KIDDE, 0MAF8 & NMAF6) is greater than the emission limit imposed on Flexo in the original facility Air State Facility Permit (and continued in this permit) for purposes of capping the facility under the major source thresholds of 6NYCRR Part 201-6 which is 45 tons per year (tpy) when using any of the three oxidizers (00OXY, 00TEC, or 00RTO) with the minimum required removal efficiency of 65%. Since an overall reduction in VOC emissions of 65% from any of the presses (00MAF, KIDDE, 0MAF8 & NMAF6) does not limit actual emissions to less than 45 tpy, a greater overall VOC removal efficiency is required.

To control the potential VOC emissions to less than or equal to 45 tpy, the overall VOC removal efficiency shall must be greater than or equal to at least 81%. This minimum destruction efficiency is shall be based on the maximum VOC usage of 234 tpy expressed as using a 12-month rolling total for any all of the following



presses: (00MAF, KIDDE, 0MAF8 & NMAF6), combined. The 12-month rolling total VOC usage shall be calculated and recorded, as described below, by the last day of each month for the previous 12-month period. VOC usage refers to the total of the VOC content of all ink, varnish, adhesives, solvents, and other VOC containing materials used by the facility.

By the last day of the month, the facility shall calculate and record the following:

- i. The VOC usage in tons per month for the previous month; and
- ii. The 12-month rolling total VOC usage in tons per the previous 12-month period by summing the monthly VOC usage data for the previous 12 months.

The 234 tpy VOC usage limit is based on the from information stated in Attachment 2 of the permit application dated February 8, 2008.

The facility has documented 100% capture via permanent total enclosure testing for the room containing presses 00MAF, KIDDE, 0MAF8 & NMAF6. The most recent stack test for the two catalytic oxidizers, which have a common exhaust stack, in July 2012 demonstrated 92% destruction efficiency, therefore the current overall VOC removal efficiency associated with presses 00MAF, KIDDE, 0MAF8 & NMAF6 when routed to either catalytic oxidizer is 92%. The most recent stack test for the regenerative thermal oxidizer 00RTO in July 2012 demonstrated 97% destruction efficiency, therefore the current overall VOC removal efficiency associated with presses 00MAF, KIDDE, 0MAF8 & NMAF6 when routed to 00RTO is 97%.

Subsequent performance testing is required as detailed elsewhere in this permit in a condition per 6NYCRR Part 234.4(a). Continuous compliance with the 81% overall removal efficiency will be assured by: (1) maintaining and operating the capture system as initially designed by the manufacturer, and (2) maintaining the destruction efficiency of the catalytic oxidizer as outlined elsewhere in this permit in a condition per 6NYCRR Part 234.4(a).

Parameter Monitored: VOC

Lower Permit Limit: 81 percent reduction by weight

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.





is greater than the emission limit imposed on Flexo in the Air State Facility Permit issued to allow installation of press 0FK10 and the regenerative thermal oxidizer 00RTO for purposes of capping the project under the major project status thresholds of 6NYCRR Part 231-2 New Source Review which is 49 tons per year (tpy) when using any of the three oxidizers (00OXY, 00TEC, or 00RTO) with the minimum required removal efficiency of 75%. Since an overall reduction in VOC emissions of 75% from press 0FK10 does not limit actual emissions to less than 49 tpy, a greater overall VOC removal efficiency is required.

To control the potential VOC emissions to less than or equal to 49 tpy, the overall VOC removal efficiency must at least shall be greater than or equal to 79%. This minimum destruction efficiency is shall be based on the maximum VOC usage of 234 tpy tpy expressed as using a 12-month rolling total for press 0FK10. The 12-month rolling total VOC usage shall be calculated and recorded, as described below, by the last day of each month for the previous 12-month period. VOC usage refers to the total of the VOC content of all ink, varnish, adhesives, solvents, and other VOC containing materials used by the facility.

By the last day of the month, the facility shall calculate and record the following:

- i. The VOC usage in tons per month for the previous month; and
- ii. The 12-month rolling total VOC usage in tons per the previous 12-month period by summing the monthly VOC usage data for the previous 12 months.

The 234 tpy VOC usage limit is based on the from information stated in Attachment 2 of the permit application dated February 8, 2008.

The facility has documented 100% capture via permanent total enclosure testing for the room containing press 0FK10. The most recent stack test for the two catalytic oxidizers, which have a common exhaust stack, in July 2012 demonstrated 92% destruction efficiency, therefore the current overall VOC removal efficiency associated with press 0FK10 when routed to either catalytic oxidizer is 92%. The most recent stack test for the regenerative thermal oxidizer 00RTO in July 2012 demonstrated 97% destruction efficiency, therefore the current overall VOC removal efficiency associated with press 0FK10 when routed to 00RTO is 97%.

Subsequent performance testing is required as detailed

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elsewhere in this permit in a condition per 6NYCRR Part 234.4(a). Continuous compliance with the 79% overall removal efficiency will be assured by: (1) maintaining and operating the capture system as initially designed by the manufacturer, and (2) maintaining the destruction efficiency of the catalytic oxidizer as outlined elsewhere in this permit in a condition per 6NYCRR Part 234.4.

Parameter Monitored: VOC

Lower Permit Limit: 79 percent reduction by weight

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 31: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 31.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PRINT

Process: 00A

Emission Source: 00OXY

Emission Unit: U-PRINT

Process: 00A

Emission Source: 00RTO

Emission Unit: U-PRINT

Process: 00A

Emission Source: 00TEC

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This condition applies to either the regenerative thermal oxidizer (00RTO) or the catalytic oxidizers (00TEC & 00OXY) when emissions are routed from presses 00MAF, KIDDE, 0MAF8, & NMAF6.

Flexo-Transparent Inc. must assure compliance with the minimum overall VOC removal efficiency rate of 81% for the



capture and control devices. The overall VOC removal efficiency is the product of the capture efficiency of the gas collection system and the destruction efficiency of the oxidizer.

The minimum overall VOC removal efficiency rate is greater than required by 6NYCRR Part 234.3(a)(1)(ii)(b) because the individual VOC potential-to-emit (PTE) of presses 00MAF, KIDDE, 0MAF8, & NMAF6 is greater than the emission limit imposed on Flexo in the original facility Air State Facility Permit (and continued in this permit) for purposes of capping the facility under the major source thresholds of 6NYCRR Part 201-6 which is 45 tons per year (tpy).

The overall VOC removal efficiencies must be verified via performance testing for destruction efficiency and permanent total enclosure (PTE). Performance tests determining the destruction efficiencies of the oxidizers must be performed, in accordance with 40CFR60, Appendix A, Method 18, 25 or 25A. These tests shall be repeated at least once every five years, based on the dates of the previous tests. The most recent test was performed on July 26 & 27, 2012. The capture efficiencies will be determined by testing the PTE systems of the press rooms in accordance with 40CFR60, Appendix A, Method 204. The PTE testing need only be repeated if physical changes to either of the press rooms occur. The capture efficiency testing of the emission sources need only be repeated if physical changes to the air distribution system occur. Physical changes to the air distribution system include, but are not limited to, adding print stations to a press, increasing or decreasing the volumetric flow rate from the dryer (e.g., by changing the size of press fans/motors or removal or derating of dryers), and changing the static duct pressure.

Test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date at least 30 days prior to the test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

Lower Permit Limit: 81 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

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 32: Compliance Certification**

**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 32.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PRINT

Process: 00A

Emission Source: 00OXY

Emission Unit: U-PRINT

Process: 00A

Emission Source: 00RTO

Emission Unit: U-PRINT

Process: 00A

Emission Source: 00TEC

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 32.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Flexo-Transparent Inc. (Flexo) is required to properly maintain and operate the oxidizers, identified as 00RTO, 00TEC, & 00OXY, to ensure the destruction efficiency of the units are maintained. This shall be accomplished by completing the regularly scheduled maintenance activities as specified in the manufacturer's maintenance manual. The maintenance activities shall be documented in the maintenance file through the use of purchase orders and other similar work agreements.

Flexo is required to have complete inspections of the oxidizers performed by a third-party on a calendar year basis. An inspection report must be submitted within 45 days of the inspection to the Regional Air Pollution Control Engineer.

Flexo is required to monitor the integrity of the catalyst by completing the following two activities on an annual basis:

- (1) Sample and analyze the catalyst, as per the





minimum overall VOC removal efficiency rate of 79% for the capture and control devices. The overall VOC removal efficiency is the product of the capture efficiency of the gas collection system and the destruction efficiency of the oxidizer.

The minimum overall VOC removal efficiency rate is greater than required by 6NYCRR Part 234.3(a)(1)(ii)(d) because the individual VOC potential-to-emit (PTE) of press 0FK10 is not less than the 49 tons per year (tpy) emission limit imposed on Flexo in the Air State Facility Permit issued to allow installation of press 0FK10 and the regenerative thermal oxidizer 0ORTO for purposes of capping the project under the major project status thresholds of 6NYCRR Part 231-2 New Source Review.

The overall VOC removal efficiencies must be verified via performance testing for destruction efficiency and permanent total enclosure (PTE). Performance tests determining the destruction efficiencies of the oxidizers must be performed, in accordance with 40CFR60, Appendix A, Method 18, 25 or 25A. These tests shall be repeated at least once every five years, based on the dates of the previous tests. The most recent test was performed on July 26 & 27, 2012. The capture efficiencies will be determined by testing the PTE systems of the press rooms in accordance with 40CFR60, Appendix A, Method 204. The PTE testing need only be repeated if physical changes to either of the press rooms occur. The capture efficiency testing of the emission sources need only be repeated if physical changes to the air distribution system occur. Physical changes to the air distribution system include, but are not limited to, adding print stations to a press, increasing or decreasing the volumetric flow rate from the dryer (e.g., by changing the size of press fans/motors or removal or derating of dryers), and changing the static duct pressure.

Test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date at least 30 days prior to the test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

Lower Permit Limit: 79 percent reduction by weight  
Reference Test Method: EPA Method 18, 25, 25A, 204  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2014.  
Subsequent reports are due every 6 calendar month(s).

**Condition 34: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 34.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-PRINT Process: 00A	Emission Source: 00OXY
Emission Unit: U-PRINT Process: 00A	Emission Source: 00RTO
Emission Unit: U-PRINT Process: 00A	Emission Source: 00TEC
Regulated Contaminant(s): CAS No: 0NY998-00-0	VOC

**Item 34.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

This condition limits facility usage of volatile organic compound (VOC) containing materials on an individual press basis.

This will assure that:

- (1) the required minimum overall VOC removal efficiencies are maintained,
- (2) the individual press VOC potential-to-emit (PTE) of any of the following presses (00MAF, KIDDE, 0MAF8 & NMAF6) is less than the 45 ton per year emission limit imposed on Flexo-Transparent, Inc. (Flexo) in the original facility Air State Facility Permit (and continued in this permit) for purposes of capping the facility under the major source thresholds of 6NYCRR Part 201-6,
- (3) the individual press VOC potential-to-emit (PTE) of press 0FK10 is less than the 49 ton per year emission limit imposed on Flexo in the Air State Facility Permit issued to allow installation of press 0FK10 and the regenerative thermal oxidizer 00RTO for purposes of capping the project under the major project status



thresholds of 6NYCRR Part 231-2 New Source Review, and  
(4) The individual press maximum VOC usage, based on information stated in Attachment 2 of the permit application dated February 8, 2008, is 234 tons per year.

Flexo will maintain records of the usage of ink, varnish, adhesive, solvent, and other VOC containing products including, but not limited to purchase and/or production records, VOC content of products, and hours of operation. All records shall be kept on-site for a minimum of five years. This information shall be made available to the Department on request.

Monitoring Frequency: MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2014.  
Subsequent reports are due every 6 calendar month(s).

**Condition 35: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 35.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-PRINT Process: 00A	Emission Source: 00OXY
Emission Unit: U-PRINT Process: 00A	Emission Source: 00RTO
Emission Unit: U-PRINT Process: 00A	Emission Source: 00TEC
Regulated Contaminant(s): CAS No: 0NY998-00-0	VOC

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Continuous control equipment monitors for the following parameters must be installed, periodically calibrated, and operated at all times that the associated control equipment is operated:



- (1) Combustion zone temperature of all oxidizers;
- (2) Inlet temperature at the catalytic oxidizer bed;
- (3) Break-through of VOC on a carbon adsorption unit; and
- (4) Any other continuous monitoring or recording device required by the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 36: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 36.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PRINT

Process: 00A

Emission Source: 00OXY

Emission Unit: U-PRINT

Process: 00A

Emission Source: 00TEC

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Flexo-Transparent will monitor on a weekly basis the inlet and outlet oxidizer temperatures for oxidizers 00TEC & 00OXY, while at least one press is actively printing, to confirm that a temperature rise across the catalyst bed is occurring. This will assure that the catalyst is destroying VOCs.

These observations will be recorded in a log at the facility and shall be made available for inspection by Department representatives upon request. Records will be



maintained for a period of at least five years.

Monitoring Frequency: WEEKLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2014.  
Subsequent reports are due every 6 calendar month(s).

**Condition 37: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 37.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-PRINT  
Process: 00A Emission Source: 00RTO

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

**Item 37.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Flexo-Transparent (Flexo) will operate a regenerative thermal oxidizer (00RTO) to control volatile organic compounds (VOC). Flexo will assure that all VOC-laden gas streams from operating presses are routed to a properly operating oxidizer.

Flexo will continuously monitor the combustion chamber temperature of 00RTO. The temperature will be maintained at or above 1594 degrees F, or above the temperature at which the most recent RTO performance test was conducted, to assure the minimum destruction efficiency based on source performance testing.

A continuous monitor to measure the combustion chamber temperature must be installed, periodically calibrated, and operated at all times 00RTO is operating. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. Flexo shall maintain continuous recording charts of the combustion chamber temperatures. 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.





of 5 years and be made available for review upon request by the Department.

Flexo shall also maintain a daily operating time log for the capture system, control device, monitoring equipment and each affected printing line, and a maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages. These logs shall be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 648 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 39: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 39.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PRINT

Process: 00A

Emission Source: 00OXY

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 39.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Flexo-Transparent (Flexo) will assure that all VOC-laden gas streams from operating presses are routed to a properly operating oxidizer. Flexo will continuously monitor the temperature of the inlet gas stream to the oxidizer identified as 00OXY. The temperature will be maintained at or above 623 degrees F to assure the minimum destruction efficiency based on source performance



testing.

Continuous monitors to measure the temperature rise across the catalytic incinerator beds must be installed, periodically calibrated, and operated at all times the catalytic oxidizers are operating. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. FlexoTransparent shall maintain continuous recording charts of the bed temperatures. 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.

Flexo shall also maintain a daily operating time log for the capture system, control device, monitoring equipment and each affected printing line, and a maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages. These logs shall be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 623 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 40: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 234.6**

**Item 40.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 40.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility subject to this Part



shall not:

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

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

(c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 41: Compliance Certification**

**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 234.7**

**Item 41.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 41.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks, 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: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 42: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:6 NYCRR 234.8**

**Item 42.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PRINT                      Emission Point: 00001

Emission Unit: U-PRINT                      Emission Point: 00002

**Item 42.2:**

Compliance Certification 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. 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 using Method 22 at least once per week from each



facility emission point 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: 10 percent  
Reference Test Method: EPA Method 22, EPA Method 9  
Monitoring Frequency: WEEKLY  
Averaging Method: 6 MINUTE AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2014.  
Subsequent reports are due every 6 calendar month(s).

**Condition 43: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:40CFR 63.820(a)(2), Subpart KK**

**Item 43.1:**  
The Compliance Certification activity will be performed for the Facility.

**Item 43.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

The owner or operator of this facility at which wide-web flexographic printing presses are operated shall



establish the facility as an area source with respect to 40CFR63 Subpart KK - Printing & Publishing by using:

(i) Less than 10 tons per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for source categories or purposes other than printing and publishing, and

(ii) Less than 25 tons per each rolling 12-month period of any combination of HAPs at the facility, including materials used for source categories or purposes other than printing and publishing.

Recordkeeping reporting will be performed as required by 40CFR 63-KK.829(d).

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 44: Compliance Certification**

**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 44.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 44.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each facility which commits to the criteria of 40CFR63.820(a)(2) for the purpose of capping the facility out of 40CFR63 Subpart KK shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria.

These records shall be kept on a monthly basis, and shall include the mass of all hazardous air pollutant (HAP) containing materials used during the month, and the mass fraction of HAP present in each HAP-containing material used.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



The initial report is due 7/30/2014.  
Subsequent reports are due every 6 calendar month(s).

**Condition 45: Compliance Certification**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 45.1:**

The Compliance Certification activity will be performed for the Facility.

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

**Item 45.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Flexo-Transparent Inc. is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) since the facility has potential pre-control device VOC emissions greater than 50 tons per year, which is the major source threshold level, and control devices are used to achieve compliance with an emission standard. This rule required Flexo-Transparent to submit a CAM Plan which detailed and justified the monitoring indicators and performance criteria used at the facility to assure proper operation of the control devices.

The CAM Plan, submitted as Attachment 5 with the Title V Facility Permit Application dated February, 2008, was prepared by Hazard Evaluations, Inc. for Flexo-Transparent. The plan was submitted to the Department and approved via the issuance of this permit. The plan has been incorporated into the permit via conditions per 6NYCRR Part 234.4(a), 234.4(c), 234.6, 234.7, and 234.8.

Flexo-Transparent is required to maintain and operate all monitoring equipment at all times while printing is occurring. If either Flexo-Transparent or the Department determines that there is a need for an improved monitoring plan, Flexo-Transparent may be required to develop a Quality Improvement Plan (QIP) per 40CFR Part 64.8.

In addition to the semi-annual reporting requirements of 6NYCRR Part 201-6.5(c)(3)(ii), 201-6.5(c)(3), and 201-6.5(e) as outlined elsewhere in permit conditions, Flexo-Transparent must, to satisfy the reporting requirements of 40CFR Part 64.9, include information with those semi-annual reports which summarizes:



1. the number, duration, and cause of exceedances; and corrective actions taken;
2. the number, duration and cause for monitor downtime incidents; and
3. description of the actions taken to implement a QIP during the reporting period, if necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2014.  
Subsequent reports are due every 6 calendar month(s).

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

**Condition 46: Emission Point Definition By Emission Unit  
Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 46.1:**

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

Emission Unit: U-PRINT

Emission Point: 00001  
Height (ft.): 20 Diameter (in.): 42  
NYTMN (km.): 4753.8 NYTME (km.): 186.8 Building: PRESS

Emission Point: 00002  
Height (ft.): 26 Diameter (in.): 42  
NYTMN (km.): 4753.8 NYTME (km.): 186.8 Building: PRESS

**Condition 47: Process Definition By Emission Unit  
Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 47.1:**

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

Emission Unit: U-PRINT  
Process: 00A Source Classification Code: 4-05-003-01  
Process Description:  
Flexographic printing onto plastic film, cloth, or paper.  
Control of emissions using catalytic oxidation and  
regenerative thermal oxidation.





covered and also actively vented to an oxidizer via ductwork.

Emission Source/Control: 00OXY - Control  
Control Type: CATALYTIC OXIDATION

Emission Source/Control: 00RTO - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: 00TEC - Control  
Control Type: CATALYTIC OXIDATION

Emission Source/Control: DTANK - Process



**STATE ONLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.**

**Condition 48: Contaminant List**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 48.1:**

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 49: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

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

**Item 49.1:**

(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 50: Visible Emissions Limited**  
**Effective between the dates of 02/11/2014 and 02/10/2019**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 50.1:**

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.



