



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-1402-00808/00003  
Effective Date:

Expiration Date:

Permit Issued To: MOD-PAC CORP  
1801 ELMWOOD AVE  
BUFFALO, NY 14207

Contact: STEVE ANDERSON  
MOD PAC CORP  
1801 ELMWOOD AVE  
BUFFALO, NY 14207-2496  
(716) 873-2496

Facility: MOD-PAC CORP  
1801 ELMWOOD AVE  
BUFFALO, NY 14207

**Description:**

(1) Mod-Pac Corporation is located at 1801 Elmwood Avenue, City of Buffalo, New York. The facility is a commercial printing facility specializing in the printing and manufacture of custom folding cartons and stock packaging.

(2) This permit action changes the air facility registration to an air state facility permit due to the facility no longer being eligible to cap-by-rule.

(3) The facility's potential volatile organic compound (VOC) emissions are greater than 100,000 pounds per year (lbs/yr). The facility has accepted an emission limit on actual total VOC emissions to less than 96,000 lbs/yr to avoid Title V applicability. The facility must submit an annual capping compliance report to the Department certifying the facility has operated within the permit emission limits.

(4) The lithographic printing operations account for approximately 95% of the facility's VOC emissions. Of the materials used in the lithographic operations, the majority of the VOCs are produced from three types of materials including cleaning solutions, fountain solutions and blanket wash. VOC emissions from these three material types will be monitored a monthly basis. If the 12-month rolling total emissions from the lithographic cleaning solutions, fountain solutions and blanket wash are greater than 80,000 lbs/yr, then VOC emissions from all VOC sources will immediately be inventoried and tracked on a 12-month rolling basis.

(5) The facility has six (6) existing natural gas burning engine/generator sets which were used to produce electricity for facility operations until the year 2013. The engines are subject to *40CFR63 Subpart ZZZZ—National Emissions Standards for*



*Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.*

The generator sets are currently operated for emergency use. There are four 750 KW engines and two 280 KW engines. Each engine/generator is equipped with a built-in catalytic converter. The manufacturer indicates a reduction of 97% oxides of nitrogen and 94% carbon monoxide. Before the facility can re-start these engines for power production beyond emergency use, a permit modification is required and all applicable requirements must be evaluated.

(6) As per 6NYCRR Part 234.3(c)(1), the offset lithographic printing process must use as-applied cleaning materials with a VOC concentration less than 70 percent by weight VOC or a composite vapor pressure of less than or equal to 10 millimeters mercury at 20 degrees Celsius (10 mm Hg at 20°C).

(7) As per 6NYCRR Part 234.3(d)(1), the VOC content of the fountain solution used in the sheet-fed offset lithographic printing process must contain no more than five percent alcohol by weight, as applied.

(8) The offset lithographic printing process uses a cleaning material identified as Autowash 6000, manufactured by Printer's Service and distributed by Prisco. Preliminary results of an air screening analysis indicate three contaminants from the Autowash 6000 exceed the NYS Annual Guideline Concentration (AGC). To address the potential off-site impacts, Mod-Pac has proposed to investigate replacement of the Autowash 6000 with a product that can satisfy the applicable AGC/SGC. The department agrees with this approach and as allowed under §212-1.5(d) a one-year trial period may commence. Within 30 days of issuance of this permit, Mod-Pac shall submit a written plan to document the trial product replacement program.

(9) A hot melt adhesive is used to glue the edges of cardboard cartons. In accordance with 6NYCRR Part 228-2, Table 1 for "Contact Bond Adhesives", the corresponding VOC content limit is 250 grams per liter (g/l), as-applied. Compliance with this limit is demonstrated through a Method 24 analysis.

(10) As per 6NYCRR Part 228-2.4(b)(1), all surface preparation solvents used with adhesive operations shall have a VOC concentration less than 70 g/l.

(11) As per 6NYCRR Part 228-2.4(b)(3), all cleaning solvents used with adhesive operations shall have a composite vapor pressure less than 45 mm Hg at 20°C.

(12) The renewal application must be submitted to the department at least 180 days, but not more than 18 months, prior to the date of permit expiration. While the renewal application is being processed by the department, the owner or operator of the facility may continue to operate under the terms and conditions of the existing permit, provided the application is submitted in accordance with 6NYCRR Part 201-5.2(c).

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 9140200808**



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: LISA M CZECHOWICZ  
NYSDEC - REGION 9  
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 \*\*\*\***  
**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

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

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.3:**

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

**Condition 4: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

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



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

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

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

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

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

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BUFFALO, NY 14207

Authorized Activity By Standard Industrial Classification Code:  
2759 - COMMERCIAL PRINTING, NEC  
2657 - FOLDING PAPERBOARD BOXES

Permit Effective Date:

Permit Expiration Date:





**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- \*2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 3 6 NYCRR 211.1: Air pollution prohibited

**Emission Unit Level**

**EU=1-PAPER,Proc=001**

- 4 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 5 6 NYCRR 212-2.4 (b): Compliance Demonstration

**EU=2-PRINT**

- 6 6 NYCRR 212-1.5 (d): Compliance Demonstration
- 7 6 NYCRR 234.3 (c) (1): Compliance Demonstration
- 8 6 NYCRR 234.3 (d) (1): Compliance Demonstration
- 9 6 NYCRR 234.5: Compliance Demonstration
- 10 6 NYCRR 234.6: Compliance Demonstration
- 11 6 NYCRR 234.7: Compliance Demonstration
- 12 6 NYCRR 234.8: Compliance Demonstration

**EU=3-GENER,Proc=03A**

- \*13 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*14 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 15 40CFR 63, Subpart ZZZZ: Compliance Demonstration
- 16 40CFR 63, Subpart ZZZZ: Compliance Demonstration

**EU=3-GENER,Proc=03B**

- 17 40CFR 63, Subpart ZZZZ: Compliance Demonstration

**EU=3-GENER,Proc=03C**

- 18 40CFR 60, NSPS Subpart JJJJ: Compliance Demonstration

**EU=4-MISCL,Proc=007**

- 19 6 NYCRR 228-2.4 (a): Compliance Demonstration
- 20 6 NYCRR 228-2.4 (b) (1): Compliance Demonstration
- 21 6 NYCRR 228-2.4 (b) (3): Compliance Demonstration
- 22 6 NYCRR 228-2.4 (b) (4): Compliance Demonstration
- 23 6 NYCRR 228-2.4 (d): Compliance Demonstration
- 24 6 NYCRR 228-2.5 (a): Compliance Demonstration
- 25 6 NYCRR 228-2.5 (c): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 26 ECL 19-0301: Contaminant List
- 27 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 28 6 NYCRR Subpart 201-5: Emission Unit Definition
- 29 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 30 6 NYCRR 201-5.3 (c): Compliance Demonstration

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31 6 NYCRR 211.2: Visible Emissions Limited

**Emission Unit Level**

32 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit

33 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



**FEDERALLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

**Item A: Sealing - 6 NYCRR 200.5**

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

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

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

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

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

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

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

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



required to operate such device effectively.

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

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

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

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

**Item E: Recycling and Salvage - 6 NYCRR 201-1.7**

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

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

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

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

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

**Item H: Proof of Eligibility for Sources Defined as Trivial**



**Activities - 6 NYCRR 201-3.3 (a)**

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

**Item I: Required Emission Tests - 6 NYCRR 202-1.1**

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

**Item J: Open Fires Prohibitions - 6 NYCRR 215.2**

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

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

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

**Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)**

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All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**FEDERAL APPLICABLE REQUIREMENTS**

**The following conditions are federally enforceable.**

**Condition 1: Facility Permissible Emissions  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 1.1:**

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

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

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

PTE: 96,000 pounds per year

**Condition 2: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 2.1:**

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

6 NYCRR Subpart 201-6

**Item 2.2:**

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

**Item 2.3:**

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

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other state and federal air pollution control requirements, regulations or law.

**Item 2.4:**

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

**Item 2.5:**

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

**Item 2.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0      VOC

**Item 2.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

**VOC EMISSION LIMIT**

(1) Facility-wide emissions of total volatile organic compounds (VOC) shall not equal or exceed 96,000 pounds per year (lbs/yr). Mod-Pac has accepted these emission limitations, below the major source threshold of 100,000 lbs/yr, to avoid Title V applicability.

(2) The lithographic printing operations account for approximately 95% of the facility's VOC emissions. Of the materials used in the lithographic operations, the majority of the VOCs are produced from three types of materials including cleaning solutions, fountain solutions and blanket wash. Past usage indicates total VOC emissions from these materials are about 70,000 lbs/yr. The remaining VOC emissions from the facility typically equate to less than 10,000 lbs/yr and include inks, adhesives and exempt and trivial sources.

(3) Since the majority of VOCs are emitted from the lithographic cleaning solutions, fountain solutions and blanket wash, the VOC emissions from these materials will be monitored on a monthly basis. The total facility VOC



emissions will be certified annually. If the 12-month rolling emissions from the lithographic cleaning solutions, fountain solutions and blanket wash are greater than 80,000 lbs/yr, then VOC emissions from all VOC sources, including exempt and trivial sources, will immediately be inventoried and tracked on a 12-month rolling basis. The facility may assume a constant VOC emission rate for the exempt and trivial sources, as presented in the permit application, provided there are no significant changes in the emission sources.

(4) On-going compliance monitoring of the VOC emissions shall be documented as follows:

(a) Monthly VOC emission calculations shall be completed by multiplying the monthly usage or purchase of cleaning solutions, fountain solutions and blanket wash by the VOC content of the material. The VOC emissions for each month must be added to the previous 11 months to generate the 12-month rolling total VOC emissions for each month.

(b) An annual emission calculation shall be completed to demonstrate the facility total VOC emissions do not equal or exceed 96,000 lbs/yr.

(c) The following or similar information shall be maintained to demonstrate the emission calculations are verifiable and enforceable:

(i) a spreadsheet documenting each cleaning solution, fountain solution and blanket wash; the VOC content of each material; the total amount of material used or purchased each month; the monthly VOC emission estimate for each material; the 12-month rolling total VOC emission estimate for each material; and the cumulative total VOC emission estimate for all the materials.

(ii) a current list of all VOC containing or producing products in use throughout the facility. This list must include: information on the manufacturer, brand, product name or code, VOC content, or other manufacturer's product specifications, material content reports or laboratory analyses providing this information;

(iii) all purchase orders, invoices, and other documents to support information in the compliance demonstration.

(5) An exceedance of the 96,000 lbs/yr total VOC emission limit or failure to fulfill the recordkeeping and reporting requirements constitutes a violation and shall



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be reported in the annual compliance certification report.

(6) The 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 the facility, 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.

(7) On an annual basis, 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 sources within the limits imposed by the emission cap.

Parameter Monitored: VOC

Upper Permit Limit: 96000 pounds per year

Monitoring Frequency: ANNUALLY

Averaging Method: ANNUAL TOTAL

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 3: Air pollution prohibited  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 3.1:**

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

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

**Condition 4: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 212-1.6 (a)**

**Item 4.1:**

The Compliance Demonstration activity will be performed for:

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Emission Unit: 1-PAPER  
Process: 001

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

**Item 4.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

WASTE PAPER COLLECTION  
PARTICULATE MATTER (PM)  
OPACITY LIMIT

(1) As required by 6NYCRR Part 212-1.6(a), No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.

(2) Compliance with this requirement shall be determined by the facility owner/operator conducting a survey of visible emissions whenever a process is in operation. If any visible emissions are identified, corrective action is required.

(3) The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: EPA Method 9  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 5: Compliance Demonstration**  
**Effective for entire length of Permit**

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

**Item 5.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAPER  
Process: 001

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Regulated Contaminant(s):

CAS No: 0NY075-00-0      PARTICULATES

**Item 5.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

WASTE PAPER COLLECTION  
PARTICULATE MATTER (PM)  
EMISSION LIMIT

The control of particulate emissions generated from the waste paper collection system are restricted as follows:

(1) As required by 6NYCRR Part 212-2.4(b)(1), emissions of solid particulates are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis (grains/dscf).

(2) Mod-Pac shall operate and maintain the dust collection system in accordance with manufacturer recommendations.

(3) On-going compliance monitoring of the particulate emissions are required as follows:

(a) Weekly visible emission observations and inspection of any fall-out from the process and/or dust collector(s) shall be completed whenever a process is in operation.

(b) Weekly differential pressure measurements of the dust collector(s) shall be completed whenever a process is in normal operation.

(c) Differential pressure shall be measured between the inlet and outlet to the dust collector(s). The dust collector(s) shall be operated within the differential pressure range specified by the manufacturer.

(d) The differential pressure transducer(s) shall be calibrated annually or as required by the manufacturer.

(e) If any visible emissions, particulate fall-out or pressure measurement is recorded outside the manufacturer range, then Mod-Pac shall inspect the source, initiate corrective action, and restore operation of the dust collector and associated capture system to its normal operation as expeditiously as practicable.

(4) Records shall be maintained to include: (i) a log

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documenting whether any visible emissions or fall-out were observed, (ii) a log of the weekly pressure drop measurements with reference to the manufacturer differential pressure range, (iii) the date and time of the observation or measurement, (iv) corrective action taken (if any), and (v) the cause of any visible emissions, fall-out or pressure measurements outside the manufacturer range (if known). The records shall be kept on-site and be made available to the Department upon request.

(5) Compliance testing shall be conducted at the request of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 6: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 212-1.5 (d)**

**Item 6.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

**Item 6.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PART 212 EVALUATION  
AUTOWASH 6000 PRODUCT REPLACEMENT

(1) The offset lithographic printing process uses a cleaning material identified as Autowash 6000, manufactured by Printer's Service and distributed by Prisco. The material has a VOC content greater than 70% by weight. The composite vapor pressure is less than 10 mm Hg at 20°C; thus, satisfying the requirement of 6NYCRR Part 234.3(c)(1).

(2) The chemical composition of the Autowash 6000 includes the following compounds:



64742-48-9, aliphatic petroleum distillate,  
70-80%  
64742-95-6, solvent naptha, light aromatic,  
10-20%  
95-63-6, 1,2,4-trimethylbenzene, 5-10%  
1330-20-7, xylene, <=2.5%  
98-82-8, cumene, <=2.5%  
100-41-4, ethylbenzene, <=2.5%

(3) An air dispersion model was completed to evaluate potential off-site impacts of the air emissions from the facility. Preliminary results of the analysis indicate three contaminants from the Autowash 6000 exceed the NYS Annual Guideline Concentration (AGC). The contaminants are solvent naptha, 1,2,4-trimethylbenzene and xylene. In accordance with 6NYCRR Part 212, these three compounds are considered non-criteria contaminants.

(4) As per §212-2.1(b), the amount of air cleaning required for a non-criteria contaminant is specified in Table 4. The emission rate potential of the three contaminants from the individual emission points is less than 0.1 lbs/hr. As such, the amount of air cleaning required is governed by the environmental rating assigned to the contaminant by the department and by using air dispersion modeling to demonstrate the maximum offsite air concentration is less than the applicable AGC/SGC. Mod-Pac has completed an initial, conservative, screening dispersion analysis that exceeds the AGC for the three non-criteria contaminants.

(5) To address the potential off-site impacts, Mod-Pac has proposed to investigate replacement of the Autowash 6000 with a product that can satisfy the applicable AGC/SGC. The department agrees with this approach and as allowed under §212-1.5(d) a one-year trial period may commence.

(6) Within 30 days of issuance of this permit, Mod-Pac shall submit a written plan to document the trial product replacement program. The plan shall include providing a 6-month and 1-year report update.

(7) If the trial replacement is unsuccessful, Mod-Pac has the option to complete a more refined dispersion analysis using AERMOD to demonstrate compliance with the AGC. A dispersion model protocol must be submitted to the department for review within one-month following the end of the one-year trial period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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**DESCRIPTION**

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 7: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 234.3 (c) (1)**

**Item 7.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

Regulated Contaminant(s):

CAS No: 000000-00-0 VOC

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

OFFSET LITHOGRAPHIC PRINTING PROCESS  
CLEANING MATERIAL VOC LIMITS

(1) The offset lithographic printing process cleaning material volatile organic compound (VOC) limits are as follows:

(i) the cleaning material, as applied, contains less than 70 percent by weight VOC; or

(ii) the cleaning material, as applied, shall have a composite vapor pressure of less than or equal to 10 millimeters mercury at 20 degrees Celsius (10 mm Hg at 20°C).

(2) The projected use of any new products in this process must demonstrate compliance with 6NYCRR Subpart 234 and satisfy any applicable permit modification requirements prior to use.

(3) A Method 24 analysis on the "as-applied" product is required to demonstrate compliance. A Method 24 analysis must be provided from an Environmental Laboratory Approval Program (ELAP) certified laboratory.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: CLEANING MATERIAL

Parameter Monitored: COMPOSITE VAPOR PRESSURE

Upper Permit Limit: 10 millimeters of mercury

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Reference Test Method: EPA Method 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL  
CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 8: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 234.3 (d) (1)**

**Item 8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

Regulated Contaminant(s):  
CAS No: 000000-00-0 VOC

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

**SHEET-FED OFFSET LITHOGRAPHIC PRINTING  
FOUNTAIN SOLUTION ALCOHOL LIMITS**

(1) A sheet-fed offset lithographic printing process that uses fountain solutions containing VOC shall satisfy the following criteria:

- (a) the fountain solution as applied contains no more than five percent alcohol by weight or equivalent;
- (b) the fountain solution as applied contains no more than 8.5 percent alcohol by weight when the fountain solution is refrigerated to less than 60°F or 15.5°C; or
- (c) the fountain solution as applied contains no more than five percent alcohol substitute by weight and no alcohol.

(2) Sheet-fed offset lithographic presses with a sheet size of 11 inches by 17 inches or smaller or any press with a fountain solution reservoir of less than one gallon are not subject to the above requirements.

(3) The fountain solution used by Mod-Pac includes two products identified as HC77-599 Alkaless (Prisco Alkaless 3000) and Prisco 141-143 Fountain Concentrate. The fountain solution is prepared by combining seven (7) gallons of each product into a tote with 300 gallons of

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water. No other additives are used. The prepared solution is dispensed onto the plates.

(4) Given the alcohol content of each product and the mix ratio 7:7:300, the actual as-applied alcohol content is approximately 2%; less than 5%.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: ALCOHOL

Upper Permit Limit: 5 percent alcohol by weight

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 234.5**

**Item 9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

This prohibition shall not apply to the following:

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

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

A person selling an ink, coating, or adhesive used in a



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printing process subject to this Part must, upon request, provide the buyer with certification of the VOC content of the coating, ink or adhesive supplied.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 10: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 234.6**

**Item 10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 11: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 234.7**

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

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Emission Unit: 2-PRINT

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 12: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 234.8**

**Item 12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRINT

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

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Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 13: Capping Monitoring Condition**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 13.1:**

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 Subpart 201-6

**Item 13.2:**

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

**Item 13.3:**

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 13.4:**

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 13.5:**

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 13.6:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-GENER

Process: 03A

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

**Item 13.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

**CARBON MONOXIDE  
ROUTINE PERFORMANCE TESTING  
SIX NATURAL GAS GENERATORS**

- (1) Before the facility can re-start these engines for power production beyond emergency use, a permit modification is required and all applicable requirements, including but not limited to NSR, PSD, NOx RACT, and NESHAP ZZZZ, must be evaluated.
- (2) If the engines are re-started for power usage, a performance test to demonstrate compliance with the proposed 94 percent control efficiency of carbon monoxide emissions across the catalytic converter for each natural gas engine must be completed within 60 days after re-starting the engines for power usage but not later than 180 days after start-up.
- (3) The performance test must be conducted at the maximum normal operating process load during the three-run performance test.
- (4) The inlet and outlet concentration level of carbon monoxide across the catalytic converter shall be determined using 40 CFR part 60, Appendix A, Method 10.
- (5) A performance test protocol shall be submitted to the Department for approval at least 60 days prior to completion of the test. The Department must be notified 10 days prior to the scheduled test date so a Department representative may be present during the test.
- (6) The results of the performance test shall be submitted to the Department within 60 days following completion of the performance test.
- (7) Subsequent performance test requirements will be at the discretion of the Department based on design, operation and maintenance practices used to minimize the impact of excess emissions on ambient air quality, the environment and human health.

Parameter Monitored: CARBON MONOXIDE

Lower Permit Limit: 94 percent degree of air cleaning or  
greater

Reference Test Method: EPA Method 10

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED

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VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 14: Capping Monitoring Condition**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 14.1:**

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 Subpart 201-6

**Item 14.2:**

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

**Item 14.3:**

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 14.4:**

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 14.5:**

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 14.6:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-GENER  
Process: 03A

Regulated Contaminant(s):  
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 14.7:**

Compliance Demonstration shall include the following monitoring:

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Capping: Yes

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

NITROGEN OXIDES  
ROUTINE PERFORMANCE TESTING  
SIX NATURAL GAS GENERATORS

(1) Before the facility can re-start these engines for power production beyond emergency use, a permit modification is required and all applicable requirements, including but not limited to NSR, PSD, NO<sub>x</sub> RACT and NESHAP ZZZZ, must be evaluated.

(2) If the engines are re-started for power usage, a performance test to demonstrate compliance with the proposed 97 percent control efficiency of nitrogen oxides emissions across the catalytic converter for each natural gas engine must be completed within 60 days after re-starting the engines for power usage but not later than 180 days after start-up.

(3) The performance test must be conducted at the maximum normal operating process load during the three-run performance test.

(4) The inlet and outlet concentration level of nitrogen oxides across the catalytic converter shall be determined using 40 CFR part 60, Appendix A, Method 7 or 7E.

(5) A performance test protocol shall be submitted to the Department for approval at least 60 days prior to completion of the test. The Department must be notified 10 days prior to the scheduled test date so a Department representative may be present during the test.

(6) The results of the performance test shall be submitted to the Department within 60 days following completion of the performance test.

(7) Subsequent performance test requirements will be at the discretion of the Department based on design, operation and maintenance practices used to minimize the impact of excess emissions on ambient air quality, the environment and human health.

Parameter Monitored: OXIDES OF NITROGEN

Lower Permit Limit: 97 percent degree of air cleaning or  
greater

Reference Test Method: EPA Method 7

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

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Averaging Method: MINIMUM - NOT TO FALL BELOW STATED

VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 15: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63, Subpart ZZZZ**

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-GENER

Process: 03A

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

TWO-402 HP EMERGENCY ENGINES  
4SRB, NATURAL GAS, BUILT OCTOBER 2002  
40CFR63 SUBPART ZZZZ

- (1) Operate/maintain engine & control device per manufacturer's instructions or owner-developed maintenance plan;
- (2) Emergency engines must have hour meter and record hours of operation;
- (3) Change oil & filter every 500 hours or annually, whichever comes first;
- (4) May use oil analysis program specified in §63.6625(i) instead of prescribed oil change frequency;
- (5) Inspect hoses & belts every 500 hours or annually, whichever comes first, and replace as necessary;
- (6) Inspect spark plugs every 1,000 hours or annually, whichever comes first, and replace as necessary;
- (7) Keep records of maintenance;
- (8) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes; and
- (9) Notifications not required.
- (10) Unlimited use for emergencies (e.g., power outage, fire, flood). May operate for 100 hr/yr for maintenance and readiness testing.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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**Condition 16: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63, Subpart ZZZZ**

**Item 16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-GENER

Process: 03A

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

FOUR-1,054 HP EMERGENCY ENGINES  
4SRB, NATURAL GAS, BUILT APRIL 2004  
40CFR63 SUBPART ZZZZ

- (1) Operate/maintain engine & control device per manufacturer's instructions or owner-developed maintenance plan;
- (2) Emergency engines must have hour meter and record hours of operation;
- (3) Change oil & filter every 500 hours or annually, whichever comes first;
- (4) May use oil analysis program specified in §63.6625(i) instead of prescribed oil change frequency;
- (5) Inspect hoses & belts every 500 hours or annually, whichever comes first, and replace as necessary;
- (6) Inspect spark plugs every 1,000 hours or annually, whichever comes first, and replace as necessary;
- (7) Keep records of maintenance;
- (8) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes; and
- (9) Notifications not required.
- (10) Unlimited use for emergencies (e.g., power outage, fire, flood). May operate for 100 hr/yr for maintenance and readiness testing.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 17: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63, Subpart ZZZZ**



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**Item 17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-GENER

Process: 03B

**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

EMERGENCY DIESEL FIRE PUMP  
125 HP, BUILT 2002  
40CFR63 SUBPART ZZZZ

- (1) Operate/maintain engine & control device per manufacturer's instructions or owner-developed maintenance plan;
- (2) Change oil & filter every 500 hours or annually, whichever comes first;
- (3) May use oil analysis program specified in §63.6625(i) instead of prescribed oil change frequency;
- (4) Inspect hoses & belts every 500 hours or annually, whichever comes first, and replace as necessary;
- (5) Inspect air cleaner every 1,000 hours or annually, whichever comes first, and replace as necessary;
- (6) Emergency engines must have hour meter and record hours of operation;
- (7) Keep records of maintenance;
- (8) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes;
- (9) Notifications not required; and
- (10) Unlimited use for emergencies (e.g., power outage, fire, flood). May operate for 100 hr/yr for maintenance and readiness testing.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 18: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 60, NSPS Subpart JJJJ**

**Item 18.1:**

The Compliance Demonstration activity will be performed for:

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Emission Unit: 3-GENER  
Process: 03C

**Item 18.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

EMERGENCY 260HP ENGINE  
NATURAL GAS, BUILT 2011  
40CFR60 SUBPART JJJJ

- (1) Operators comply by purchasing an engine certified by the manufacturer;
- (2) Keep manufacturer certification on-site verifying compliance with 40CFR60 Subpart JJJJ;
- (3) Operate/maintain engine & control device per manufacturer's instructions;
- (4) Emergency engines must have a non-resettable hour meter and record hours of operation;
- (5) Keep records of maintenance; and
- (6) Unlimited use for emergencies (e.g., power outage, fire, flood). May operate for 100 hr/yr for maintenance and readiness testing.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 19: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.4 (a)**

**Item 19.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL  
Process: 007

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

**Item 19.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

CONTACT BOND



HOT MELT ADHESIVE VOC LIMITS

(1) A hot melt adhesive is used to glue the edges of cardboard cartons. In accordance with 6NYCRR Part 228-2, Table 1 for "Contact Bond Adhesives", the corresponding VOC content limit is 250 grams per liter (g/l), as-applied. Compliance with this limit is demonstrated through a Method 24 analysis.

(2) The projected use of any new products in this process must demonstrate compliance with Subpart 228 and satisfy any applicable permit modification requirements prior to use.

(3) A Method 24 analysis on the "as-applied" product must be provided from an Environmental Laboratory Approval Program (ELAP) certified laboratory.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: ADHESIVE

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 250 grams per liter

Reference Test Method: EPA Method 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL  
CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 20: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (1)**

**Item 20.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

Process: 007

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 20.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

ADHESIVE OPERATION

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**SURFACE PREPARATION SOLVENTS  
VOC CONTENT LIMIT**

- (1) The concentration of volatile organic compound (VOC) in all surface preparation solvents used with adhesive operations shall be less than 70 grams per liter.
- (2) The projected use of any new surface preparation solvent in this process must demonstrate compliance with Subpart 228 and satisfy any applicable permit modification requirements prior to use.
- (3) A Method 24 analysis on the “as-applied” product must be provided from an Environmental Laboratory Approval Program (ELAP) certified laboratory.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: CLEANING MATERIAL

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 70 grams per liter

Reference Test Method: EPA Method 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL  
CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 21: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (3)**

**Item 21.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

Process: 007

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 21.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

**ADHESIVE OPERATIONS  
CLEANUP SOLVENT LIMIT**

- (1) The composite vapor pressure in all cleanup solvents

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used with adhesive operations shall be less than 45 mm Hg at 20°C.

(2) The projected use of any new surface preparation solvent in this process must demonstrate compliance with Subpart 228 and satisfy any applicable permit modification requirements prior to use.

(3) The composite vapor pressure of organic compounds in cleaning materials shall be determined by quantifying the amount of each compound in the blend using gas chromatographic analysis ASTM E 260-96 (2006) for organics and ASTM D3792-05 for water content, as applicable, and following the equation in 6NYCRR Part 228-2.6(e).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: CLEANING MATERIAL

Parameter Monitored: COMPOSITE VAPOR PRESSURE

Upper Permit Limit: 45 millimeters of mercury

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 22: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (4)**

**Item 22.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

Process: 007

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 22.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

When performing the removal of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment, the facility owner or operator must:

1. use an enclosed cleaning system, or an equivalent cleaning system as determined by the applicable test

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method identified in 6 NYCRR Part 228-2.6(h);

2. use a solvent with a VOC content less than or equal to 70 grams per liter; and

3. soak all parts containing dried adhesive in a solvent with a composite vapor pressure, excluding water and exempt compounds, less than or equal to 9.5 mm Hg at 20 degrees Celsius. The solvent and any soaking parts must be kept in a closed container at all times except when adding or removing parts from the container.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 70 grams per liter

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 23: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.4 (d)**

**Item 23.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

Process: 007

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 23.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Work practices shall be employed at facilities where the total actual VOC emissions from all industrial adhesive application processes, including related cleaning activities, equal or exceed three tons in a 12-month rolling period, before consideration of emission control equipment. Work practices shall include:

(1) the following types of application equipment, with the use of low-VOC adhesives or adhesive primers: electrostatic spray; HVLP spray; flow coat; roll coat or hand application, including non-spray application methods



similar to hand or mechanically powered caulking gun, brush, or direct hand application; dip coat (including electrodeposition); airless spray; air-assisted airless spray; any other adhesive application method, subject to Department approval, capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spraying;

(2) the following work practices for storage, mixing operations, and handling operations for adhesives, thinners, and adhesive-related waste materials that:

(i) store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers;

(ii) ensure that mixing and storage containers used for VOC-containing adhesives, adhesive primers, and process related waste materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing adhesives, adhesive primers, and process related waste materials; and

(iv) convey VOC-containing adhesives, adhesive primers, and process related waste materials from one location to another in closed containers or pipes.

(3) the following work practices to reduce VOC emissions from cleaning materials used in industrial adhesive application processes that:

(i) store all VOC-containing cleaning materials and used shop towels in closed containers;

(ii) ensure that storage containers used for VOC-containing materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing cleaning materials;

(iv) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

(v) minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that

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equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 24: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.5 (a)**

**Item 24.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL  
Process: 007

Regulated Contaminant(s):  
CAS No: 000000-00-0 VOC

**Item 24.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities using products subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) shall maintain records demonstrating compliance with the VOC content limits, including, but not limited to, the following information:

- (1) a list of each commercial and industrial adhesive, sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at the facility;
- (2) identification of each product by product name and description;
- (3) the VOC content of each product as supplied;
- (4) the mix ratio of any catalysts, reducers or other components used;
- (5) the final VOC content or vapor pressure, as applied; and
- (6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer,



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cleanup or surface preparation solvent used at the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 25: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.5 (c)**

**Item 25.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-MISCL

Process: 007

Regulated Contaminant(s):

CAS No: 00NY998-00-0 VOC

**Item 25.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records made to determine compliance with Subpart 228-2 shall be maintained for five years from the date such record is created and shall be made available to the Department within 90 days of a request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**STATE ONLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

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

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

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

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.

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Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

## STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

**Condition 26: Contaminant List**  
**Effective for entire length of Permit**

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

**Item 26.1:**

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

CAS No: 000630-08-0  
Name: CARBON MONOXIDE

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

CAS No: 0NY210-00-0  
Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0

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Name: VOC

**Condition 27: Malfunctions and start-up/shutdown activities  
Effective for entire length of Permit**

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

**Item 27.1:**

(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 28: Emission Unit Definition  
Effective for entire length of Permit**

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

**Item 28.1:**

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

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Emission Unit: 1-PAPER

Emission Unit Description:

Emission unit 1-PAPER consists of two cyclone units used to collect paper trimmings for recycling.

**Item 28.2:**

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

Emission Unit: 2-PRINT

Emission Unit Description:

Emission unit 2-PRINT includes eight (8) off-set lithographic printing presses.

**Item 28.3:**

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

Emission Unit: 3-GENER

Emission Unit Description:

Emission unit 3-GENER includes generators and a fire pump.

**Item 28.4:**

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

Emission Unit: 4-MISCL

Emission Unit Description:

Emission unit 4-MISCL includes several miscellaneous operations.

**Condition 29: Renewal deadlines for state facility permits**  
**Effective for entire length of Permit**

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

**Item 29.1:**

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Condition 30: Compliance Demonstration**  
**Effective for entire length of Permit**

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

**Item 30.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 30.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

**Monitoring Description:**

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control

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Engineer (RAPCE) at the following address:

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 9  
270 Michigan Ave.  
Buffalo, NY 14203

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 12 calendar month(s).

**Condition 31: Visible Emissions Limited**  
**Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 31.1:**

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

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

**Condition 32: Emission Point Definition By Emission Unit**  
**Effective for entire length of Permit**

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

**Item 32.1:**

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

Emission Unit: 1-PAPER

Emission Point: 00001

Height (ft.): 27

Diameter (in.): 24

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 00002

Height (ft.): 27

Diameter (in.): 24

NYTMN (km.): 4761.951 NYTME (km.): 183.72

**Item 32.2:**

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

Emission Unit: 2-PRINT

Emission Point: 00003

Height (ft.): 35

Diameter (in.): 24

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NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 00028

Height (ft.): 23

Diameter (in.): 15

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0004A

Height (ft.): 24

Diameter (in.): 10

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0004B

Height (ft.): 24

Diameter (in.): 10

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0004C

Height (ft.): 24

Diameter (in.): 10

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0018A

Height (ft.): 13

Diameter (in.): 18

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0018B

Height (ft.): 13

Diameter (in.): 18

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0018C

Height (ft.): 13

Diameter (in.): 18

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0024A

Height (ft.): 32

Diameter (in.): 6

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0024B

Height (ft.): 32

Diameter (in.): 6

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0028A

Height (ft.): 23

Diameter (in.): 15

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0028B

Height (ft.): 23

Diameter (in.): 15

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 0028C

Height (ft.): 23

Diameter (in.): 15

NYTMN (km.): 4761.951 NYTME (km.): 183.72

**Item 32.3:**

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

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Emission Unit: 3-GENER

Emission Point: 00008

Height (ft.): 35

Diameter (in.): 12

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 00009

Height (ft.): 35

Diameter (in.): 12

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 00010

Height (ft.): 35

Diameter (in.): 10

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 00011

Height (ft.): 35

Diameter (in.): 12

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 00015

Height (ft.): 35

Diameter (in.): 12

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 00016

Height (ft.): 35

Diameter (in.): 12

NYTMN (km.): 4761.951 NYTME (km.): 183.72

Emission Point: 00027

Height (ft.): 21

Diameter (in.): 4

NYTMN (km.): 4761.951 NYTME (km.): 183.72

**Item 32.4:**

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

Emission Unit: 4-MISCL

Emission Point: 00025

Height (ft.): 11

Diameter (in.): 30

NYTMN (km.): 4761.951 NYTME (km.): 183.72

**Condition 33: Process Definition By Emission Unit  
Effective for entire length of Permit**

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

**Item 33.1:**

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

Emission Unit: 1-PAPER

Process: 001

Process Description:

Process 001 includes a waste paper collection system and



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two (2) cyclone units used to collect paper trimmings. The process operations begin by taking large rolls of stock paper and card stock, and cutting the paper into the necessary sizes for feeding into the printing and forming machines. A large blower is used to move the waste paper trimmings through a vacuum duct network to the cyclones, where the heaviest paper trimmings fall out of the air flow. Paper collected by the cyclones is combined into large bales and sent off-site for recycling. The annual waste paper generation is about 4,000 tons.

Emission Source/Control: CYCL6 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: CYCL8 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: PAPER - Process

**Item 33.2:**

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

Emission Unit: 2-PRINT

Process: 002

Process Description:

Process 002 involves the application of inks using offset lithographic printing presses. Eight (8) Heidelberg press units are used in the high speed printing department. The printing process involves the application of inks to rollers, which are then rolled over screens to apply the inks to the paper in specific patterns. A 5% VOC release factor has been assumed for conventional sheetfed inks and varnish based on the Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing (USEPA, 2006). In addition, a release factor of 1.0 is used for UV and water-based inks. A 50% release factor has been assumed for 5% of the Autowash 6000 press wash that is manually applied; as it has a vapor pressure of less than 10 mm Hg at 20 degrees Celsius. 100% of the wash/cleaner VOC is used in the total emission calculations. This process is subject to 6NYCRR Part 234 - Graphic Arts.

Emission Source/Control: HDB10 - Process

Emission Source/Control: HDB12 - Process

Emission Source/Control: HDB14 - Process

Emission Source/Control: HDB16 - Process

Emission Source/Control: HDB20 - Process

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Emission Source/Control: HDB22 - Process

Emission Source/Control: HDB24 - Process

Emission Source/Control: HDG18 - Process

**Item 33.3:**

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

Emission Unit: 2-PRINT

Process: 004

Process Description:

Process 004 involves the application of inks to paper napkins using three (3) C&P letterpress machines. The process involves ink application to a plate, from which rolls collect ink. The rolls then apply the collected ink to napkins. The napkin is inked on a design completing the final product. Materials in use in this process include inks and cleaning solvents. This process is subject to 6NYCRR Part 234. This process has one exempt lead melting pot.

Emission Source/Control: CPLP1 - Process

Emission Source/Control: CPLP2 - Process

Emission Source/Control: CPLP3 - Process

**Item 33.4:**

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

Emission Unit: 2-PRINT

Process: 005

Process Description:

Process 005 involves the application of inks to paper sheets and foil using kluge units which are a type of letterpress. The two types of Kluge Units in use include Ink Units and Foil Units. The Kluge Units utilize the platen press design. The platen moves by cam action from a horizontal open position where the sheet is fed to a closed vertical position where the impression is made. There are two (2) Kluge Ink Units and seven (7) Kluge Foil Units. This process is subject to 6NYCRR Part 234.6, Part 234.7 and Part 234.8.

Emission Source/Control: KLGF1 - Process

Emission Source/Control: KLGF2 - Process

Emission Source/Control: KLGF3 - Process

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Emission Source/Control: KLGF4 - Process

Emission Source/Control: KLGF5 - Process

Emission Source/Control: KLGF6 - Process

Emission Source/Control: KLGF7 - Process

Emission Source/Control: KLG11 - Process

Emission Source/Control: KLG12 - Process

**Item 33.5:**

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

Emission Unit: 2-PRINT

Process: 006

Process Description:

Process 006 involves the application of inks to paper sheets using two (2) thermography machines or Virko Printing Units. The thermography machines consist of three sections connected by a conveyor. The first section applies a thermographic polymer to the entire sheet followed by a gentle vacuuming to remove the excess powder from the non-Imaged and dry ink areas. The areas selected for raised printing are printed with inks that do not contain dryers or hardeners so that they remain wet during the application of powder. This ink will be dried or hardened later during the heating process. The second section of the process is a vacuum system that removes excess powder from those portions of the paper surface that have not been inked. The sheet is then conveyed through a radiant oven system and exposed to temperatures of 900 to 1300 degrees Fahrenheit. The heating process takes 2.5 to 3 seconds. This process is subject to 6NYCRR Part 234 - Graphic Arts.

Emission Source/Control: VRK01 - Process

Emission Source/Control: VRK02 - Process

**Item 33.6:**

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

Emission Unit: 3-GENER

Process: 03A

Process Description:

Process 03A includes six (6) existing natural gas burning generators which were used to produce electricity for facility operations until the year 2013. These generators are currently used for emergency purposes. There are four 750 KW generators and two 280 KW generators. Each

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generator is equipped with a built-in catalytic converter that must be properly maintained.

These generators are subject to the requirements of 40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Emission Source/Control: NGBG1 - Combustion  
Design Capacity: 750 kilowatts

Emission Source/Control: NGBG2 - Combustion  
Design Capacity: 750 kilowatts

Emission Source/Control: NGBG3 - Combustion  
Design Capacity: 750 kilowatts

Emission Source/Control: NGBG4 - Combustion  
Design Capacity: 750 kilowatts

Emission Source/Control: NGBG5 - Combustion  
Design Capacity: 280 kilowatts

Emission Source/Control: NGBG6 - Combustion  
Design Capacity: 280 kilowatts

**Item 33.7:**

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

Emission Unit: 3-GENER

Process: 03B

Process Description:

Process 03B includes an existing diesel powered fire suppression pump. This pump is used only during fire emergencies to provide sufficient pumping capability for the fire suppression sprinklers. The unit is equipped with a 125 hp diesel engine. The unit is test run once annually for approximately two hours while pumping water during testing of the sprinkler system. The engine exhaust is equipped with a catalytic converter.

This pump is subject to the requirements of 40 CFR 63 Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Emission Source/Control: FPUMP - Combustion  
Design Capacity: 125 horsepower (mechanical)

**Item 33.8:**

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

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Emission Unit: 3-GENER

Process: 03C

Process Description:

Process 03C includes a new back-up natural gas fired generator to power the facility computer systems and emergency lights in the event of a power outage. In addition, Process 03C includes a new back-up natural gas fired generator to power the emergency lights in the generator room.

The generators are subject to the requirements of 40 CFR 63 Subpart JJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

Emission Source/Control: BCKGN - Combustion

Design Capacity: 120,000 British thermal units per hour

Emission Source/Control: MTGEN - Combustion

Design Capacity: 89,000 British thermal units per hour

**Item 33.9:**

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

Emission Unit: 4-MISCL

Process: 007

Process Description:

Process 007 involves the application of adhesives to cardboard cartons using fifteen (15) gluing machines. The machines fold and glue the edges on the cartons using various adhesives. As the adhesives dry, the cartons maintain their shape. This process is subject to 6NYCRR Part 228-2.

Emission Source/Control: GLU01 - Process

Emission Source/Control: GLU02 - Process

Emission Source/Control: GLU03 - Process

Emission Source/Control: GLU04 - Process

Emission Source/Control: GLU05 - Process

Emission Source/Control: GLU06 - Process

Emission Source/Control: GLU07 - Process

Emission Source/Control: GLU08 - Process

Emission Source/Control: GLU09 - Process

Emission Source/Control: GLU10 - Process

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Emission Source/Control: GLU11 - Process

Emission Source/Control: GLU12 - Process

Emission Source/Control: GLU13 - Process

Emission Source/Control: GLU14 - Process

Emission Source/Control: GLU15 - Process

**Item 33.10:**

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

Emission Unit: 4-MISCL

Process: 008

Process Description:

Process 008 includes one (1) plate cleaning machine using various plate cleaning products. Plates are loaded into the plate cleaning machine and are cleaned with chemicals. This process is subject to 6NYCRR Part 234 - Graphic Arts.

Emission Source/Control: CLEAN - Process

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