



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 9-1422-00093/00035  
Mod 0 Effective Date: 03/06/2007 Expiration Date: 03/05/2012  
Mod 1 Effective Date: 08/01/2008 Expiration Date: 03/05/2012  
Mod 2 Effective Date: 02/23/2011 Expiration Date: 03/05/2012

Permit Issued To: INTERNATIONAL IMAGING MATERIALS INC  
310 COMMERCE DR  
AMHERST, NY 14228-2303

Contact: JEFFREY A WITTLINGER  
INTERNATIONAL IMAGING  
310 COMMERCE DR  
BUFFALO, NY 14228  
(716) 691-6333

Facility: INTERNATIONAL IMAGING  
310 COMMERCE DR  
AMHERST, NY 14228

Contact: JEFFREY A WITTLINGER  
INTERNATIONAL IMAGING  
310 COMMERCE DR  
BUFFALO, NY 14228  
(716) 691-6333

**Description:**

IIMAK is a manufacturer of thermal transfer ribbons. IIMAK coats polyester film with wax and solvent-based backings and inks for use in bar code applicators, color printers and facsimile machines. The solvent-based coatings are manufactured on site and coating machines are used to apply the coatings to the films.

This permit modification allows the construction and operation of a new emission source, coating machine MSC-5 which is designated as emission source 00311. The addition of the new coater was subject to 6NYCRR Part 231-11 New Source Review (NSR). The potential volatile organic compounds (VOC) emissions from the coater are greater than 40 tons per year which is the NSR significant project threshold. Since all emissions from the coater are captured and piped to a thermal regenerative oxidizer with greater than 99% destruction efficiency, the actual VOC emissions from the coater are calculated to be approximately 2.5 tons per year. With issuance of this permit modification IIMAK accepts a 39 ton per year VOC cap on the new emission source which limits the VOC emissions below the Part 231-11 significant project threshold.

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 9142200093**



IIMAK will be required to certify that the permanent total enclosure of MSC-5 meets the 100% capture requirements per testing performed in accordance with EPA Reference Method 204.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator:           DAVID S DENK  
  DIVISION OF ENVIRONMENTAL PERMITS  
  270 MICHIGAN AVE  
  BUFFALO, NY 14203-2915

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



**Notification of Other State Permittee Obligations**

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

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

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

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

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

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



**DEC GENERAL CONDITIONS**

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

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

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

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

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

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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



**Condition 2-1: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 2-1.1:**

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

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

**Condition 5: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 5.1:**

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

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

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

**Condition 2-2: Submission of application for permit modification or renewal-REGION 9**

**HEADQUARTERS**

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

**Item 2-2.1:**

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



**Condition 8: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS**

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

**Item 8.1:**

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

**New York State Department of Environmental Conservation**

Permit ID: 9-1422-00093/00035

Facility DEC ID: 9142200093



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: INTERNATIONAL IMAGING MATERIALS INC  
310 COMMERCE DR  
AMHERST, NY 14228-2303

Facility: INTERNATIONAL IMAGING  
310 COMMERCE DR  
AMHERST, NY 14228

Authorized Activity By Standard Industrial Classification Code:  
3955 - CARBON PAPER AND INKED RIBBONS

Mod 0 Permit Effective Date: 03/06/2007

Permit Expiration Date: 03/05/2012

Mod 1 Permit Effective Date: 08/01/2008

Permit Expiration Date: 03/05/2012

Mod 2 Permit Effective Date: 02/23/2011

Permit Expiration Date: 03/05/2012



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2-1 6 NYCRR 201-6.5 (a) (7): Fees
- 2 6 NYCRR 201-6.5 (a) (7): Fees
- 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.5 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR Part 215: Open Fires Prohibited at Industrial and Commercial Sites
- 2-2 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 12 6 NYCRR 201-1.7: Recycling and Salvage
- 11 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
- 16 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
- 17 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
- 18 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
- 2-3 6 NYCRR 202-1.1: Required Emissions Tests
- 19 6 NYCRR 202-1.1: Required Emissions Tests
- 20 6 NYCRR 211.3: Visible Emissions Limited
- 21 40 CFR Part 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6 NYCRR Subpart 201-6: Emission Unit Definition
- 24 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 25 6 NYCRR 201-7.1: Facility Permissible Emissions
- \*2-4 6 NYCRR 201-7.1: Capping Monitoring Condition
- \*26 6 NYCRR 201-7.1: Capping Monitoring Condition
- \*27 6 NYCRR 201-7.1: Capping Monitoring Condition
- \*28 6 NYCRR 201-7.1: Capping Monitoring Condition
- 29 6 NYCRR 228-1.5 (a): Compliance Certification
- 30 6 NYCRR Subpart 231-2: Compliance Certification

#### Emission Unit Level

- 31 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 32 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

#### EU=1-BOILR

- 33 6 NYCRR 227-1.3 (a): Compliance Certification

#### EU=1-CBS01



34 6 NYCRR 212.10: Submerged fill is RACT for underground VOL storage tanks.

**EU=1-WEIGH**

35 6 NYCRR 212.4 (c): Compliance Certification

36 6 NYCRR 212.6 (a): Compliance Certification

**EU=X-OXDZR**

37 6 NYCRR 228-1.3: Compliance Certification

38 6 NYCRR 228-1.3: Compliance Certification

39 6 NYCRR 228-1.3: Compliance Certification

40 6 NYCRR 228-1.3: Compliance Certification

**EU=X-OXDZR,Proc=OXB,ES=00311**

2-5 6 NYCRR 228-1.3: Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

41 ECL 19-0301: Contaminant List

2-6 6 NYCRR 201-1.4: Unavoidable noncompliance and violations

42 6 NYCRR 201-1.4: Unavoidable noncompliance and violations

2-7 6 NYCRR 211.2: Air pollution prohibited

43 6 NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

**EU=X-OXDZR**

44 6 NYCRR 201-1.4: Compliance Demonstration

NOTE: \* preceding the condition number indicates capping.



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

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

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

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

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

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

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

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

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

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



**Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.3 (a) (4)**

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

**Item D: Certification by a Responsible Official - 6 NYCRR 201-6.3 (d) (12)**

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

**Item E: Requirement to Comply With All Conditions - 6 NYCRR 201-6.5 (a) (2)**

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

**Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.5 (a) (3)**

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

**Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5 (a) (5)**

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

**Item H: Property Rights - 6 NYCRR 201-6.5 (a) (6)**

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



**Item I: Severability - 6 NYCRR 201-6.5 (a) (9)**

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

**Item J: Permit Shield - 6 NYCRR 201-6.5 (g)**

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

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

**Item K: Reopening for Cause - 6 NYCRR 201-6.5 (i)**

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

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



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

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

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

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

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

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

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

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



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

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

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

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

**Condition 1: Acceptable Ambient Air Quality**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 200.6**

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

**Condition 2-1: Fees**  
**Effective between the dates of 02/23/2011 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (7)**

**Item 2-1.1:**  
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

**Condition 2: Fees**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (7)**

**Item 2.1:**

**New York State Department of Environmental Conservation**

Permit ID: 9-1422-00093/00035

Facility DEC ID: 9142200093



The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

**Condition 3: Recordkeeping and reporting of compliance monitoring  
Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (c)**

**Item 3.1:**

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

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

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

**Condition 4: Monitoring, Related Recordkeeping, and Reporting  
Requirements.  
Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (c) (2)**

**Item 4.1:**

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

**Condition 5: Compliance Certification  
Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (c) (3) (ii)**

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.



**Item 5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.



If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

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

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above



referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 6: Compliance Certification**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (e)**

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
  - such additional requirements as may be specified elsewhere in this permit related to compliance certification.

- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

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iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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

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

The address for the RAPCE is as follows:

270 Michigan Avenue  
Buffalo, NY 14203-2999

The address for the BQA is as follows:

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

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2008.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

**Condition 8: Recordkeeping requirements**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 8.1:**

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

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

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

**Condition 9: Open Fires Prohibited at Industrial and Commercial Sites**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR Part 215**

**Item 9.1:**

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

**Condition 2-2: Open Fires - Prohibitions**  
**Effective between the dates of 02/23/2011 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 215.2**

**Item 2-2.1:**

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

**Item 2-2.2**

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

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to



allow burning within any village.

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

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

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

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

**Condition 10: Maintenance of Equipment  
Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement: 6 NYCRR 200.7**

**Item 10.1:**

Any person who owns or operates an air contamination source which is equipped with an

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

**Condition 12: Recycling and Salvage**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 12.1:**

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 the ECL.

**Condition 11: Prohibition of Reintroduction of Collected Contaminants to the air**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 11.1:**

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

**Condition 13: Exempt Sources - Proof of Eligibility**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 13.1:**

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 this Subpart. 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 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.

**Condition 14: Trivial Sources - Proof of Eligibility**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 14.1:**

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. 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 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.

**Condition 15: Standard Requirement - Provide Information**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (4)**

**Item 15.1:**

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

**Condition 16: General Condition - Right to Inspect**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (8)**

**Item 16.1:**

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

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

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

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

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

**Condition 17: Standard Requirements - Progress Reports**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (d) (5)**

**Item 17.1:**

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

(i) dates for achieving the activities, milestones, or compliance required in the schedule of



compliance, and dates when such activities, milestones or compliance were achieved; and

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

**Condition 18: Off Permit Changes**

**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (f) (6)**

**Item 18.1:**

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

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

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

**Condition 2-3: Required Emissions Tests**

**Effective between the dates of 02/23/2011 and 03/05/2012**

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

**Item 2-3.1:**

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

**Condition 19: Required Emissions Tests**

**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 19.1:**

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

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shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

**Condition 20: Visible Emissions Limited**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 211.3**

**Item 20.1:**

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.

**Condition 21: Accidental release provisions.**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 21.1:**

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

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

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

**Condition 22: Recycling and Emissions Reduction**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 22.1:**

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

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



**Condition 23: Emission Unit Definition**  
Effective between the dates of 03/06/2007 and 03/05/2012

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

**Item 23.1(From Mod 2):**

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

Emission Unit: X-OXDZR

Emission Unit Description:

This emission unit includes four oxidizers, 20 coating machines, two parts washers, and two slitting machines. Coating machine MSC-5 was added to this emission unit as a result of REN 1 MOD 2. MSC-5 involves a solvent-based ink application and curing onto polyester film and vents to thermal Oxidizer No. 4. (60,000 CFM with natural gas burner).

Building(s): 2

**Item 23.2(From Mod 0):**

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

Emission Unit: 1-BOILR

Emission Unit Description:

Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.

Building(s): 2

**Item 23.3(From Mod 0):**

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

Emission Unit: 1-CBS01

Emission Unit Description:

IIMAK has the following chemical bulk storage ("CBS") tanks: (1) 15,000 gallon storage tank for methyl ethyl ketone; (2) 10,000 gallon storage tank for isopropyl alcohol; and (3) 10,000 gallon storage tank for toluene. These tanks are located in a vault below Plant #2, and are each vented to atmosphere. The solvents are used in the manufacturing of thermal transfer ribbon inks.

Building(s): 2

**Item 23.4(From Mod 1):**

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

Emission Unit: 1-CORON

Emission Unit Description:

Polyester film is subjected to a Corona Treatment process that generates ozone. The Corona Treatment units are

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connected to Coating Machines MSC-1, MSC-2, 89-2, and 89-3. The ozone is collected in hoods and vented to the roofs of Plant No. 1 & Plant No. 2 in 0.667 foot diameter pipes at 1500 CFM.

Building(s): 1  
2

**Item 23.5(From Mod 0):**

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

Emission Unit: 1-WEIGH

Emission Unit Description:

A mixture of solid pigment resins and waxes are weighed at weigh stations and are then mixed and melted at the mix tanks. Dust from the weighing process is collected into dust collectors.

Building(s): 1

**Condition 24: Non Applicable requirements**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (g)**

**Item 24.1:**

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

**Condition 25: Facility Permissible Emissions**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 25.1:**

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

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

CAS No: 0NY998-00-0 (From Mod 2) PTE: 352,000 pounds  
per year

Name: VOC

**Condition 2-4: Capping Monitoring Condition**  
**Effective between the dates of 02/23/2011 and 03/05/2012**

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

**Item 2-4.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the

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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 231-2

**Item 2-4.2:**

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

**Item 2-4.3:**

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 2-4.4:**

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 2-4.5:**

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 2-4.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 2-4.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IIMAK will not exceed an emission rate of 39 tons of VOCs per 12 month period for coating machine MSC-5, which is identified as emission source 00311. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

$$\text{VOC(MSC-5)} = [\text{VOC(es00311)} \times (1-\text{DE})] + \text{VOC(down time)} + \text{VOC(fugitive)}$$



where,

VOC(es00311) = VOC emissions generated by emission source 00311, otherwise known as MSC-5 coater.

DE = destruction efficiency of specific oxidizer as measured during performance testing. Destruction efficiency results will be updated annually via the testing required in Permit Condition #39. The most recent test results will be used in emission calculations.

VOC(MSC-5) = total VOC emissions generated by the MSC-5 coater which were released to the environment.

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

The facility shall submit to the Department an annual emission cap report for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each rolling 12-month period throughout the calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: COATING  
Parameter Monitored: VOC  
Upper Permit Limit: 39 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2011.  
Subsequent reports are due every 6 calendar month(s).

**Condition 26: Capping Monitoring Condition**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 26.1:**

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

6 NYCRR Subpart 231-2

**Item 26.2:**



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

**Item 26.3:**

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

**Item 26.4:**

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

**Item 26.5:**

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

**Item 26.6:**

The Compliance Certification activity will be performed for the Facility.

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

**Item 26.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IIMAK will not exceed an emission rate of 49 tons of VOCs per 12 month period for Plant #1 which consists of emission unit 1-WEIGH and these emission sources (with identifiers in parentheses): WEB1 (00004), WEB2 (00005), OTC3N (00007), OTC3S (00006), WEB3 (00011), WEB4 (00010), ME4 (00013), 89-1 (00009), 86-1 (00003), 84-1 (00017), WEB6 (00016), WEB5 (00015), 89-2 (00012), 89-3 (00002), 83-1 (00001), and Slitter (00026). Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

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

where,



VOC(es) = VOC emissions generated by each emission source associated with each specific oxidizer. This value is determined by proportionally distributing the facility's total solvent usage based on coating production.

DE = destruction efficiency of specific oxidizer as measured during performance testing. Destruction efficiency results will be updated annually via the testing required in Permit Condition #39. The most recent test results will be used in emission calculations.

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

VOC(Plant 1) = total VOC emissions generated by Plant 1 emission sources which were released to the environment.

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

The facility shall submit to the Department an annual emission cap report for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each rolling 12-month period throughout the calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 49 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 27: Capping Monitoring Condition**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 27.1:**

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 231-2



**Item 27.2:**

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

**Item 27.3:**

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 27.4:**

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 27.5:**

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 27.6:**

The Compliance Certification activity will be performed for the Facility.

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

**Item 27.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IIMAK will not exceed an emission rate of 49 tons of VOCs per 12 month period for emission units 1-CBS01 and for coating machines MSC-1, MSC-2, & MSC-3 which are identified as emission sources 00221, 00222, 00224, respectively, and the Renzmann parts washers which is identified as emission source 00223. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

$$\text{VOC}(1\text{-CBS01, MSC-1, MSC-2, MSC-3, Renzmann}) = [\text{VOC}(\text{es}) \times (1\text{-DE})] + \text{VOC}(\text{down time}) + \text{VOC}(\text{fugitive})$$



where,

VOC(es) = VOC emissions generated by each emission source associated with each specific oxidizer. This value is determined by proportionally distributing the facility's total solvent usage based on coating production.

DE = destruction efficiency of specific oxidizer as measured during performance testing. Destruction efficiency results will be updated annually via the testing required in Permit Condition #39. The most recent test results will be used in emission calculations.

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

VOC(1-CBS01, MSC-1, MSC-2, MSC-3, Renzmann) = emissions generated by emission unit 1-CBS01, the MSC-1, MSC-2, & MSC-3 coaters, and the Renzmann parts washers, which were released to the environment. total VOC

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

The facility shall submit to the Department an annual emission cap report for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each rolling 12-month period throughout the calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 49 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 28: Capping Monitoring Condition**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 28.1:**

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

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otherwise be subject to:

6 NYCRR Subpart 231-2

**Item 28.2:**

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

**Item 28.3:**

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 28.4:**

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 28.5:**

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 28.6:**

The Compliance Certification activity will be performed for the Facility.

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

**Item 28.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IIMAK will not exceed an emission rate of 39 tons of VOCs per 12 month period for coating machine MSC-4, which is identified as emission source 00271. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

$$\text{VOC(MSC-4)} = [\text{VOC(es00271)} \times (1-\text{DE})] + \text{VOC(down time)} + \text{VOC(fugitive)}$$

where,



VOC(es00271) = VOC emissions generated by emission source 00271, otherwise known as MSC-4 coater.

DE = destruction efficiency of specific oxidizer as measured during performance testing. Destruction efficiency results will be updated annually via the testing required in Permit Condition #39. The most recent test results will be used in emission calculations.

VOC(MSC-4) = total VOC emissions generated by the MSC-4 coater which were released to the environment.

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

The facility shall submit to the Department an annual emission cap report for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each rolling 12-month period throughout the calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 39 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 29: Compliance Certification**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.5 (a)**

**Item 29.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 29.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating

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used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the department. Records must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 30: Compliance Certification**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR Subpart 231-2**

**Item 30.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will track usage/consumption and maintain all necessary records showing the quantity of all VOC containing materials used at the facility. IIMAK will submit an annual Emission Cap Report which details, for each month, the total annual VOC emission rate calculated on a rolling, monthly basis for each of the facility's three individual emission caps. The annual report will be due 30 days after the end of each calendar year and must be submitted to the following addresses:

NYSDEC  
Regional Air Pollution Control Engineer  
270 Michigan Avenue  
Buffalo, New York 14203-2999

NYSDEC  
Bureau of Compliance Monitoring and Enforcement  
625 Broadway  
Albany, New York 12233-3258

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The records will include the VOC content of the materials and be based on verifiable data. IIMAK will maintain purchase orders and/or invoices of the VOC containing materials to confirm the general accuracy of the records. These records shall be kept on site for a minimum of five years and will be made available to the Department upon request.

Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2007.  
Subsequent reports are due every 6 calendar month(s).

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

**Condition 31: Emission Point Definition By Emission Unit**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 31.1(From Mod 2):**

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

Emission Unit: X-OXDZR

Emission Point: 00027

Height (ft.): 44 Diameter (in.): 65  
NYTMN (km.): 4771.119 NYTME (km.): 189.763 Building: 2

**Item 31.2(From Mod 0):**

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

Emission Unit: 1-BOILR

Emission Point: 00020

Height (ft.): 17 Diameter (in.): 27  
NYTMN (km.): 4771.077 NYTME (km.): 189.708 Building: 2

Emission Point: 00021

Height (ft.): 17 Diameter (in.): 27  
NYTMN (km.): 4771.071 NYTME (km.): 189.707 Building: 2

**Item 31.3(From Mod 0):**

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

Emission Unit: 1-CBS01

Emission Point: 00023



Height (ft.): 25 Diameter (in.): 4  
NYTMN (km.): 4771.11 NYTME (km.): 189.754 Building: 2

Emission Point: 00024  
Height (ft.): 25 Diameter (in.): 4  
NYTMN (km.): 4771.1 NYTME (km.): 189.756 Building: 2

Emission Point: 00025  
Height (ft.): 25 Diameter (in.): 4  
NYTMN (km.): 4771.104 NYTME (km.): 189.753 Building: 2

**Item 31.4(From Mod 1):**

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

Emission Unit: 1-CORON

Emission Point: 00028  
Height (ft.): 40 Diameter (in.): 8  
NYTMN (km.): 4771.126 NYTME (km.): 189.692 Building: 2

Emission Point: 00029  
Height (ft.): 40 Diameter (in.): 8  
NYTMN (km.): 4771.114 NYTME (km.): 189.692 Building: 2

Emission Point: 00030  
Height (ft.): 26 Diameter (in.): 8  
NYTMN (km.): 4771.096 NYTME (km.): 189.692 Building: 1

**Item 31.5(From Mod 0):**

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

Emission Unit: 1-WEIGH

Emission Point: 00018  
Height (ft.): 35 Diameter (in.): 12  
NYTMN (km.): 4771.047 NYTME (km.): 189.694 Building: 1

Emission Point: 00019  
Height (ft.): 35 Diameter (in.): 12  
NYTMN (km.): 4771.046 NYTME (km.): 189.701 Building: 1

**Item 31.6(From Mod 0):**

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

Emission Unit: X-OXDZR

Emission Point: 00008  
Height (ft.): 35 Diameter (in.): 38  
NYTMN (km.): 4771.127 NYTME (km.): 189.756 Building: 1

Emission Point: 00014  
Height (ft.): 35 Diameter (in.): 45



NYTMN (km.): 4771.121 NYTME (km.): 189.755 Building: 1

Emission Point: 00022  
Height (ft.): 44 Diameter (in.): 65  
NYTMN (km.): 4771.127 NYTME (km.): 189.761 Building: 2

**Condition 32: Process Definition By Emission Unit**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 32.1(From Mod 2):**

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

Emission Unit: X-OXDZR  
Process: OXB Source Classification Code: 3-90-006-89

Process Description:

This process involves the venting of all air emissions from the coating machines and parts washers in Plant 2 to Oxidizer #4 or Oxidizer #3, which serves as the backup unit.

Emission Source/Control: 0003A - Control  
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 0004A - Control  
Control Type: HEATED CERAMIC MEDIA

Emission Source/Control: 00221 - Process

Emission Source/Control: 00222 - Process

Emission Source/Control: 00223 - Process

Emission Source/Control: 00224 - Process

Emission Source/Control: 00271 - Process

Emission Source/Control: 00311 - Process  
Design Capacity: 21,500 cubic feet per minute (standard conditions)

**Item 32.2(From Mod 0):**

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

Emission Unit: 1-BOILR  
Process: B20 Source Classification Code: 1-03-006-02

Process Description:

Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.

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Emission Source/Control: 00020 - Combustion  
Design Capacity: 24.5 million Btu per hour

**Item 32.3(From Mod 0):**

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

Emission Unit: 1-BOILR  
Process: B21 Source Classification Code: 1-03-006-02  
Process Description:  
Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.

Emission Source/Control: 00021 - Combustion  
Design Capacity: 24.5 million Btu per hour

**Item 32.4(From Mod 0):**

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

Emission Unit: 1-CBS01  
Process: T01 Source Classification Code: 4-05-007-01  
Process Description:  
This process consists of three (3) tanks contained within a vault below Plant #2. Each are vented to atmosphere. The solvents are used in the manufacturing of thermal transfer ribbon inks.

Emission Source/Control: 00023 - Process  
Design Capacity: 15,000 gallons

Emission Source/Control: 00024 - Process  
Design Capacity: 10,000 gallons

Emission Source/Control: 00025 - Process  
Design Capacity: 10,000 gallons

**Item 32.5(From Mod 1):**

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

Emission Unit: 1-CORON  
Process: CR1 Source Classification Code: 3-16-050-03  
Process Description:  
This process consists of two corona treatment units that are connected to the MSC-1 and MSC-2 coating machines. The corona treatment units use an electrical process that pretreats the film and generates ozone as a byproduct. The ozone is collected in a hood and vented to a stack on the Plant No. 2 roof.

Emission Source/Control: 00281 - Process

Emission Source/Control: 00282 - Process



**Item 32.6(From Mod 1):**

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

Emission Unit: 1-CORON  
Process: CR2 Source Classification Code: 3-16-050-03  
Process Description:

Process consists of two corona treatment units that are connected to the MSC-3 and MSC-4 coating machines. The units are electrical processes that pretreat the film and generate ozone. The ozone is collected in hoods and vented to a stack on the Plant No. 2 roof.

Emission Source/Control: 00291 - Process

Emission Source/Control: 00292 - Process

**Item 32.7(From Mod 1):**

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

Emission Unit: 1-CORON  
Process: CR3 Source Classification Code: 3-16-050-03  
Process Description:

Process consists of two corona treatment units that are connected to the 89-2 and 89-3 coating machines. The corona treatment unit use an electrical process that pre-treats the film and generates ozone. The ozone is collected in hoods and vented to a stack on the Plant No. 1 roof.

Emission Source/Control: 00301 - Process

Emission Source/Control: 00302 - Process

**Item 32.8(From Mod 0):**

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

Emission Unit: 1-WEIGH  
Process: W01 Source Classification Code: 3-15-010-01  
Process Description:

A mixture of solid pigment resins and waxes are weighed at weigh stations and are then mixed and melted at the mix tanks. Dust from the weighing process is collected into dust collectors.

Emission Source/Control: 00018 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 00019 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0018A - Process



**Item 32.9(From Mod 0):**

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

Emission Unit: X-OXDZR

Process: OXA

Source Classification Code: 3-90-006-89

Process Description:

This process involves the venting of all air emissions from the coating and slitting machines in Plant 1 to Oxidizer #4 or Oxidizer #1, which serves as the backup unit.

Emission Source/Control: 0001A - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 0002A - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00001 - Process

Emission Source/Control: 00002 - Process

Emission Source/Control: 00003 - Process

Emission Source/Control: 00004 - Process

Emission Source/Control: 00005 - Process

Emission Source/Control: 00006 - Process

Emission Source/Control: 00007 - Process

Emission Source/Control: 00009 - Process

Emission Source/Control: 00010 - Process

Emission Source/Control: 00011 - Process

Emission Source/Control: 00012 - Process

Emission Source/Control: 00013 - Process

Emission Source/Control: 00015 - Process

Emission Source/Control: 00016 - Process

Emission Source/Control: 00017 - Process

Emission Source/Control: 00026 - Process

**Condition 33: Compliance Certification**



Effective between the dates of 03/06/2007 and 03/05/2012

Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)

**Item 33.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-BOILR

**Item 33.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit 1-BOILR on a monthly basis. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with 6NYCRR Part 227.1.3(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: MONTHLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -  
SEE MONITORING DESCRIPTION

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 34: Submerged fill is RACT for underground VOL storage tanks.  
Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 212.10**

**Item 34.1:**

This Condition applies to Emission Unit: 1-CBS01

**Item 34.2:**

The three underground VOL storage tanks (15,000, 10,000, & 10,000 gallons) located at Plant #2 are subject to the RACT requirements of 6 NYCRR Part 212.10. The continued use of submerged fill satisfies this RACT requirement.

**Condition 35: Compliance Certification  
Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 35.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-WEIGH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

If this condition appears in a Title V permit, and the Department has not otherwise directed the permittee to conduct a stack test, compliance with the 0.050 grains/dscf particulate emission standard will be determined by the permittee's observation of the outlet of the emission source to determine whether or not visible emissions are present following the guidelines similar to EPA Method 22. Visible emissions will not include those due to water vapor that is present in the exhaust gas. Observations must be made once per day while operations are taking place. These observations must be recorded in

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a log book, and be made available to the Department on request. If visible emissions are observed for two consecutive days, a Method 9 visible emissions test must be conducted by a certified observer. If the Method 9 test determines that the opacity is less than 20%, observations of the stack in question shall be used to determine that the opacity of these emissions remain less than 20%.

The semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these observations as well as instances in which visible emissions were observed or in which observations could not be made due to weather conditions.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 36: Compliance Certification**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 36.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-WEIGH

**Item 36.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions 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. Compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions when the process is in operation. If any visible emissions are identified, corrective action is

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required. 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  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2007.  
Subsequent reports are due every 6 calendar month(s).

**Condition 37: Compliance Certification**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.3**

**Item 37.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

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

**Item 37.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will maintain a permanent total enclosure around each coater to maximize the overall removal efficiency of the thermal oxidizers. The integrity of the enclosure will be ensured by periodic inspection, and by implementing a program to require the replacement, prior to resuming coater operation, of any portion of the enclosure removed during maintenance or other activities.

Monitoring Frequency: CONTINUOUS  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2007.  
Subsequent reports are due every 6 calendar month(s).

**Condition 38: Compliance Certification**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.3**

**Item 38.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: X-OXDZR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will conduct periodic maintenance on the oxidizers in accordance with manufacturer's recommendations, including visual inspection of the oxidizers exterior skin, lubrication of the main and heat return fan bearings and actuator linkages, cleaning of the main trunk screens, and replacing temperature strip charts. The units will be shut down annually for internal inspection, periodic internal maintenance, and for any necessary repairs.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 39: Compliance Certification**

**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.3**

**Item 39.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 39.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will annually analyze the destruction efficiency of each oxidizer. A organic vapor analyzer employing a flame ionization detector will be used to measure the total concentration of VOCs in the inlet and outlet air streams of each oxidizer.

The performance specifications of the monitoring instrument have been previously approved by the



Department. Department approval must be obtained prior to using a different monitoring instrument. The instrument will be capable of accurately measuring and displaying readings at the anticipated inlet/outlet concentrations. The instrument will be maintained, calibrated and operated according to manufacturer's specifications, or as specified by the Department.

The oxygen measurements at the inlet and outlet air streams will be used in calculating the VOC concentrations at the inlet and outlets corrected to 7% oxygen. Correcting both the inlet and outlet concentration measurements to the same oxygen level will eliminate any bias that may be introduced by dilution air entering the gas stream between the two measurement points.

Destruction efficiency tests will be conducted at EP00008, EP00014, EP00022, and EP00027 once each calendar year, provided the unit has operated over the last 12 months, within the six months prior to the annual shutdown/ inspection of each individual oxidizer. IIMAK will send the test results to the Department after each test. If, at any time, IIMAK or the Department has cause to believe that an oxidizer is not performing at the last measured destruction efficiency, IIMAK will make appropriate adjustments and/or repairs to the oxidizer to improve destruction efficiencies and will retest. Oxidizer emission calculations (rolling 12-month total) will be based on the latest destruction efficiency measurements.

Reference Test Method: USEPA Methods 1 & 2

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 40: Compliance Certification**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.3**

**Item 40.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 40.2:**

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will maintain and operate the thermal oxidizers at 85% overall removal efficiency whenever the coating lines are in use. This requires the maintenance of the total enclosure structures at each coater and 85% destruction efficiency at each oxidizer. IIMAK has previously developed an operational plan for maintaining total enclosure at each coater and must continue to implement the plan.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

**Condition 2-5: Compliance Certification**  
**Effective between the dates of 02/23/2011 and 03/05/2012**

**Applicable Federal Requirement:6 NYCRR 228-1.3**

**Item 2-5.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Process: OXB

Emission Source: 00311

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 2-5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The permanent total enclosure of the MSC-5 coater must be tested per EPA Reference Method 204 within 180 days of permit issuance. A test protocol shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date. Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

Parameter Monitored: CAPTURE EFFICIENCY

Lower Permit Limit: 100 percent

Reference Test Method: EPA Method 204

Monitoring Frequency: SINGLE OCCURRENCE

**New York State Department of Environmental Conservation**  
Permit ID: 9-1422-00093/00035 Facility DEC ID: 9142200093



Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED  
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



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

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

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

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

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

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

**Condition 41: Contaminant List**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 41.1:**  
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

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



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

**Condition 2-6: Unavoidable noncompliance and violations**  
**Effective between the dates of 02/23/2011 and 03/05/2012**

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

**Item 2-6.1:**

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

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

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

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

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



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

**Condition 42: Unavoidable noncompliance and violations**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 42.1:**

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

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

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

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

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



malfunction condition subject to this paragraph.

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

**Condition 2-7: Air pollution prohibited**  
**Effective between the dates of 02/23/2011 and 03/05/2012**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 2-7.1:**

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

**Condition 43: Air pollution prohibited**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 43.1:**

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 44: Compliance Demonstration**  
**Effective between the dates of 03/06/2007 and 03/05/2012**

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

**Item 44.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: X-OXDZR

**Item 44.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



IIMAK will institute a RACT Action Plan in case of oxidizer malfunction. The Plan will include the following actions:

1. IIMAK will keep an inventory of spare parts for the oxidizers and the associated fans and drives. As parts are used, new parts will be ordered to maintain replacement parts for critical components that could malfunction or have historically malfunctioned.
2. IIMAK personnel will notify maintenance staff via plant-wide page at the time that an oxidizer indicates signs of a malfunction.
3. Maintenance staff will immediately respond to any oxidizer malfunction conditions and dedicate the resources necessary to repair the oxidizer, in house, in the shortest period of time practical.
4. In the event that the malfunction is due to a utility provider or a malfunction of a component itself that can not be repaired in house, IIMAK will immediately notify and mobilize the appropriate outside agencies to correct the malfunction.
5. The shift supervisor will be contacted to determine facility status relative to existing cap limits. The shift supervisor will compare the 12 month rolling VOC total for each plant with the cap limits to determine if any coating can be performed after the current roll is finished.
6. Once an oxidizer malfunction is identified that will extend beyond the time period associated with finishing the roll being coated on each machine, IIMAK production supervisors will move low-VOC or waxed based film production to the coating machines impacted by the oxidizer malfunction, to the extent practical.
7. VOC emissions will be monitored via mass balance calculations during the malfunction period and compared with cap levels to ensure compliance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2007.

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

