



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 9-1422-00093/00035  
Effective Date: 10/25/2016 Expiration Date: 10/24/2021

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 renewal adds a toluene recovery system (TRS) which was added to the facility under a minor permit modification in 2013.

The facility consists of five emission units:

X-OXDZR: This emission unit includes all coating machines, parts washers, slitting machines, oxidizers, and the toluene recovery system (TRS) located within Plant 1 and Plant 2. The TRS has the capability to receive and treat approximately half of the facility-wide emissions.

1-CBS01: IIMAK has the following chemical bulk storage tanks: (1) 15,000 gallon storage tank for methyl ethyl ketone (MEK); (2) 10,000 gallon storage tank for either toluene, MEK, 2-propanone, or cyclohexanone; 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.



1-BOILER: 2 - 24.5 mmBTU/hr natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying;

1-WEIGH: 2 weigh stations, where solid pigments, resins and waxes are weighed, mixed and melted. Dust collectors are employed as control devices; and

1-CORON: Polyester film is subjected to a corona treatment process that generates ozone. The four (4) corona treatment units are connected to coating machines MSC-1, MSC-3, 89-2, and 89-3. The ozone is collected in hoods and vented to the roofs of Plant No. 1 & Plant No. 2.

The facility is separated into two plants, each of which accepted a volatile organic compounds (VOC) emission cap of less than 50 tons per year so that the newer of the two plants was not subject to 6 NYCRR Subpart 231-2 when it was constructed. The project encompassing the construction and operation of coating machine MSC-4 and the 60,000 cfm regenerative oxidizer, which is designated Oxidizer 4, was subject to 6NYCRR Subpart 231-2 New Source Review (NSR). The project permit, issued in 2002, imposed a VOC emission cap of less than 40 tons per year on the new emission source, coating machine MSC-4. Also, a subsequent project encompassed the construction and operation of coating machine MSC-5, which is designated as emission source 00311, was subject to NSR. The project permit, issued in 2011, imposed a VOC emission cap of less than 40 tons per year on the new emission source (coating machine MSC-5, designated emission source 00311). The 50 tons per year VOC emission cap imposed by the facility's original Title V permit remained in force for the VOC emission sources located in Plant 2 (coating machines MSC-1 through 3 and the solvent cleaning operation) even though the emissions from these sources were routed to Oxidizer 4. IIMAK is required to annually certify continuous compliance with the four VOC emission caps which all remain in effect.

There are three coating lines at the facility which are subject to 6NYCRR Subpart 228-1: Two coating lines within Plant No. 1 whose emissions are routed to Oxidizer 4, and a third coating line consisting of five (5) coating machines and a solvent cleaning process within Plant No. 2 whose emissions are routed to either Oxidizer 4 or the TRS. The TRS is used as an alternate emission control for Plant 2 emissions specifically from toluene coating stations. Oxidizer 4 is the backup to the TRS, and the backup for Oxidizer 4 within Plant 2 is Oxidizer 3. The backup to Oxidizer 4, for Plant 1 emissions, is Oxidizer 2.

The facility meets the Subpart 228-1 VOC control requirements for Class D coatings by maintaining appropriate emission control requirements per Subpart 228-1.5 with the use of the TRS, oxidizers, and permanent total enclosures around the coating machines. The facility is also subject to the general housekeeping, recordkeeping, and preventative maintenance of Subpart 228-1.

Each continuous-roll coating machine is totally enclosed so that all of the VOC-containing emissions from the machines are piped to the oxidizers for destruction or to the TRS for toluene recovery. The oxidizers are required to maintain minimum operating temperatures as determined during destruction efficiency testing and according to the Compliance Assurance Monitoring (CAM) Plan prepared in accordance with 40CFR Part 64. IIMAK is required to keep records which document the amount of VOCs emitted on a 12-month rolling total basis.



The TRS is designed and operated to adsorb organic vapors from the exhaust air collected from the multi-station coaters by passing the gas stream through two (2) of three (3) carbon beds at the same time. Each carbon bed has a maximum organic vapor adsorption capacity. The point at which the removal efficiency of the carbon begins to rapidly decrease is called the break through point. The carbon beds are operated so that any one bed of the total system never reaches the breakthrough point. A hydrocarbon analyzer serves as a process control device on the TRS outlet, measuring toluene concentration at all times that the TRS is operated. Daily calibration is required. Monitoring for breakthrough on each operating bed will take place according to the CAM Plan. A data acquisition system collects the outlet concentrations at a rate of a minimum of four data points per hour, and calculates, records, and retains 1-hr averages.

Performance test(s) determining the removal efficiency of the TRS and determining the destruction efficiency of Oxidizers #2, 3, & 4 must be performed utilizing three 1-hr test runs within 180 days of permit issuance. The test(s) must subsequently be performed once every five years, based on the date of the previous test.

The facility's two 24.5 mmBTU/hr natural gas boilers produce steam and are subject to 40CFR60 Subpart Dc which requires fuel combustion records to be maintained and to the opacity limit per 6NYCRR Subpart 227-1.

Particulate emissions from the facility's weigh stations are subject to the opacity and particulate loading limits of 6NYCRR Part 212. Emissions are controlled by fabric filters and the efficacy of the filters is maintained by monitoring of the pressure drop across the filters.

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

Permit Administrator: LISA M CZECHOWICZ  
NYSDEC - REGION 9  
270 MICHIGAN AVE  
BUFFALO, NY 14203-2915

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



**Notification of Other State Permittee Obligations**

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

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

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

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

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

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

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



**DEC GENERAL CONDITIONS**

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

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

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

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

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

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3**

Permits are transferrable with the approval of the department unless specifically prohibited by



## New York State Department of Environmental Conservation

Facility DEC ID: 9142200093

the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

### **Condition 4: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

#### **Item 4.1:**

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

#### **Item 4.3:**

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

### **Condition 5: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

#### **Item 5.1:**

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

#### **Item 5.2:**

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

### **Condition 6: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

#### **Item 6.1:**

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

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

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

### **Condition 7: Submission of application for permit modification or renewal-REGION 9**

DEC Permit Conditions  
Renewal 2/FINAL



**HEADQUARTERS**

**Applicable State Requirement:**

**6 NYCRR 621.6 (a)**

**Item 7.1:**

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

NYSDEC Regional Permit Administrator

Region 9 Headquarters

Division of Environmental Permits

270 Michigan Avenue

Buffalo, NY 14203-2915

(716) 851-7165

**New York State Department of Environmental Conservation**

Permit ID: 9-1422-00093/00035

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

Permit Effective Date: 10/25/2016

Permit Expiration Date: 10/24/2021



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
  - 2 6 NYCRR 201-6.4 (a) (7): Fees
  - 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
  - 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
  - 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
  - 6 6 NYCRR 201-6.4 (e): Compliance Certification
  - 7 6 NYCRR 202-2.1: Compliance Certification
  - 8 6 NYCRR 202-2.5: Recordkeeping requirements
  - 9 6 NYCRR 215.2: Open Fires - Prohibitions
  - 10 6 NYCRR 200.7: Maintenance of Equipment
  - 11 6 NYCRR 201-1.7: Recycling and Salvage
  - 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
  - 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
  - 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
  - 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
  - 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
  - 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
  - 18 6 NYCRR 202-1.1: Required Emissions Tests
  - 19 40 CFR Part 68: Accidental release provisions.
  - 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
  - 21 6 NYCRR Subpart 201-6: Emission Unit Definition
  - 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
  - 23 6 NYCRR 201-7.1: Facility Permissible Emissions
  - \*24 6 NYCRR 201-7.1: Capping Monitoring Condition
  - \*25 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 211.1: Air pollution prohibited
  - 30 6 NYCRR 228-1.6 (d): 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
- 34 40CFR 60.48c(a), NSPS Subpart Dc: Compliance Certification
- 35 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Certification
- 36 40CFR 60.48c(g)(2), NSPS Subpart Dc: Alternative Recordkeeping
- 37 40CFR 60.48c(g)(3), NSPS Subpart Dc: Reporting and Recordkeeping Requirements

#### EU=1-CORON



38 6 NYCRR 212-2.3 (a): Compliance Certification

**EU=1-WEIGH**

39 6 NYCRR 212-1.6 (a): Compliance Certification  
40 6 NYCRR 212-2.4 (b): Compliance Certification

**EU=X-OXDZR**

41 6 NYCRR 212-3.1 (c) (4) (i): Compliance Certification  
42 6 NYCRR 228-1.3 (a): Compliance Certification  
43 6 NYCRR 228-1.3 (b) (1): Compliance Certification  
44 6 NYCRR 228-1.3 (c): Compliance Certification  
45 6 NYCRR 228-1.3 (d): Compliance Certification  
46 6 NYCRR 228-1.4 (d): Compliance Certification  
47 6 NYCRR 228-1.5 (c): Compliance Certification  
48 6 NYCRR 228-1.5 (c): Compliance Certification  
49 6 NYCRR 228-1.5 (c): Compliance Certification  
50 6 NYCRR 228-1.5 (c): Compliance Certification  
51 6 NYCRR 228-1.6 (f) (1): Compliance Certification  
52 6 NYCRR 228-1.6 (f) (3): Compliance Certification  
53 40 CFR Part 64: Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

54 ECL 19-0301: Contaminant List  
55 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

**Emission Unit Level**

**EU=X-OXDZR**

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

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

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

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

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

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

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

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and



reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

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

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

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

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

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

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V



facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

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

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

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

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

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

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



a shorter time period in the case of an emergency.

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

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

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

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 10/25/2016 and 10/24/2021**

**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





**Condition 5: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring



report required above.

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

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate



whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

**Condition 6: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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



and

- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

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

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

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section  
USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
NYSDEC Region 9 Headquarters  
270 Michigan Avenue  
Buffalo, NY 14203-2915

The address for the BQA is as follows:

NYSDEC  
Bureau of Quality Assurance

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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 1/30/2017.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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 10/25/2016 and 10/24/2021**

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

**Item 8.1:**

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

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

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

**Condition 9: Open Fires - Prohibitions**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**Applicable Federal Requirement:6 NYCRR 215.2**

**Item 9.1:**





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 10/25/2016 and 10/24/2021

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 10.1:**

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

**Condition 11: Recycling and Salvage**  
Effective between the dates of 10/25/2016 and 10/24/2021

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

**Item 11.1:**

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

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air**  
Effective between the dates of 10/25/2016 and 10/24/2021

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

**Item 12.1:**

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

**Condition 13: Exempt Sources - Proof of Eligibility**  
Effective between the dates of 10/25/2016 and 10/24/2021

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

**Item 13.1:**

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

**Condition 14: Trivial Sources - Proof of Eligibility**  
Effective between the dates of 10/25/2016 and 10/24/2021





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2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

**Condition 20: Recycling and Emissions Reduction**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 20.1:**

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

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

**Condition 21: Emission Unit Definition**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 21.1:**

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 21.2:**

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 tanks: (1) one 15,000 gallon storage tank for methyl ethyl ketone (MEK); (2) one 10,000 gallon storage tank for either toluene, MEK, 2-propanone, or cyclohexanone; and (3) one 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.

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Building(s): 2

**Item 21.3:**

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 four (4) corona treatment units are connected to coating machines MSC-1, MSC-3, 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 21.4:**

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

**Item 21.5:**

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

Emission Unit: X-OXDZR

Emission Unit Description:

This emission unit includes all coating machines, parts washers, slitting machines, oxidizers, and the toluene recovery system (TRS) located within Plant 1 and Plant 2. Emissions from Plant 1 are routed to Oxidizer 4 with Oxidizer 2 as the backup unit, and emissions from Plant 2 sources are routed to either Oxidizer 4 or the TRS, with Oxidizer 3 as the backup unit. The TRS has the capability to receive and treat approximately half of the facility-wide emissions.

Building(s): 1  
2

**Condition 22: Progress Reports Due Semiannually**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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



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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 24.5:**

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 24.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0      VOC

**Item 24.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will track usage/consumption and maintain all necessary records showing the quantity of all volatile organic compound (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 Stationary Sources  
625 Broadway  
Albany, New York 12233-3258

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: AS REQUIRED - SEE PERMIT MONITORING

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**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

**Condition 25: Capping Monitoring Condition**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 25.1:**

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

6 NYCRR Subpart 231-2

**Item 25.2:**

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

**Item 25.3:**

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 25.4:**

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 25.5:**

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 25.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 25.7:**

Compliance Certification shall include the following monitoring:

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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:

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

where,

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

DE = destruction efficiency of specific control device as measured during performance testing.

$\text{VOC(MSC-5)}$  = total VOC emissions generated by the MSC-5 coater which were released to the environment.

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 1/30/2017.

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

**Condition 26: Capping Monitoring Condition**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**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:





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 control device as measured during performance testing.

VOC(1-CBS01, MSC-1, MSC-2, MSC-3, Renzmann) = total VOC 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.

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 1/30/2017.

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

**Condition 27: Capping Monitoring Condition**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**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





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

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 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 1/30/2017.

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

**Condition 28: Capping Monitoring Condition**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**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 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

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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 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:

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

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.

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

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

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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 1/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 29: Air pollution prohibited**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 29.1:**

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 30: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 30.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

(1) The overall removal efficiency may be made by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment. Methods provided in 6 NYCRR Part 228-1.6(a) or (b) must be used.

(2) For any control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment. The approved VOC CE test methods

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are contained in the table in 6 NYCRR Part 228-1.6(d)(2). Test methods 204 through 204F (M204 - M204F) are included in appendix M of 40 CFR part 51 (see table 1, section 200.9 of this Title). The approved test methods for determining the efficiency of the control equipment are listed in 6 NYCRR Part 228-1.6(e).

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

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 1/30/2017.

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 10/25/2016 and 10/24/2021**

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

**Item 31.1:**

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 31.2:**

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 31.3:**

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 31.4:**

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

Emission Point: 00027  
Height (ft.): 44 Diameter (in.): 65  
NYTMN (km.): 4771.119 NYTME (km.): 189.763 Building: 2

Emission Point: 0032A  
Height (ft.): 22 Diameter (in.): 26  
NYTMN (km.): 4771.08 NYTME (km.): 189.78 Building: 2

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Emission Point: 0032B  
Height (ft.): 22 Diameter (in.): 26  
NYTMN (km.): 4771.08 NYTME (km.): 189.78 Building: 2

Emission Point: 0032C  
Height (ft.): 22 Diameter (in.): 26  
NYTMN (km.): 4771.08 NYTME (km.): 189.78 Building: 2

**Condition 32: Process Definition By Emission Unit**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 32.1:**

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.

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

**Item 32.2:**

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 32.3:**

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

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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 32.4:**

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 32.5:**

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 32.6:**

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 32.7:**

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 32.8:**

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 #2, which serves as the backup unit.

Emission Source/Control: 0002A - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 0004A - Control

Control Type: HEATED CERAMIC MEDIA

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





Design Capacity: 21,500 cubic feet per minute (standard conditions)

**Item 32.10:**

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

Emission Unit: X-OXDZR

Process: TRS

Source Classification Code: 3-90-006-89

Process Description:

This process consists of a Toluene Recovery System (TRS) which removes solvent from the emissions from the MSC coating machines through a carbon adsorption system and returns it to the process. Oxidizers 3 & 4 will serve as backups to the TRS system.

Emission Source/Control: 00321 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00221 - Process

Emission Source/Control: 00222 - 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)

**Condition 33: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**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.

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The permittee will conduct observations of visible emissions from the emission unit 1-BOILER 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  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 34: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**Applicable Federal Requirement: 40CFR 60.48c(a), NSPS Subpart Dc**

**Item 34.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: 1-BOILER

**Item 34.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

The owner and operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup,

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as provided by 40 CFR 60.7 of this part. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

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 1/30/2017.

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

**Condition 35: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**Applicable Federal Requirement:40CFR 60.48c(g), NSPS Subpart Dc**

**Item 35.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-BOILR

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall record and maintain records of the amount of fuels combusted during each calendar month in the source, provided that the facility only burns very low sulfur fuel oil or other liquid or gaseous fuels with a potential sulfur dioxide (SO<sub>2</sub>) emissions rate of 0.32 lb/MMBtu (140 ng/J) heat input or less. The records for the amount of fuel burned monthly must be made available for review upon request.

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.  
The initial report is due 1/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 36: Alternative Recordkeeping**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**Applicable Federal Requirement:40CFR 60.48c(g)(2), NSPS Subpart Dc**

**Item 36.1:**

This Condition applies to Emission Unit: 1-BOILR

**Item 36.2:**

As an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO<sub>2</sub> standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

**Condition 37: Reporting and Recordkeeping Requirements**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**Applicable Federal Requirement:40CFR 60.48c(g)(3), NSPS Subpart Dc**

**Item 37.1:**

This Condition applies to Emission Unit: 1-BOILR

**Item 37.2:**

As an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO<sub>2</sub> standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

**Condition 38: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**Applicable Federal Requirement:6 NYCRR 212-2.3 (a)**

**Item 38.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-CORON

**Item 38.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The corona treatment units at Plant 1 generate ozone and are subject to the control requirements of 6 NYCRR Part 212-2.3(a) Table 3. The hourly emission rate per unit is under 1 lb/hr; unit usage totaled only 40 hours in 2015.

IIMAK completed an air dispersion modeling analysis, and submitted a summary via email dated February 26, 2016, to determine if the maximum off-site ozone concentration from a corona treatment unit is less than the National Ambient Air Quality Standard, which is 0.070 ppm as an 8-hr standard. The analysis showed a maximum 1-hr impact at the property line of 0.017 ppm and an 8-hr maximum concentration of 0.010 ppm.

Operation of the corona treatment units is limited to the use of one unit at a time to limit the off-site ozone concentration as provided in the air dispersion modeling analysis. Usage records consisting of unit identification, date, time and duration of use must be maintained on-site and made available for review.

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 1/30/2017.

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

**Condition 39: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 39.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-WEIGH

**Item 39.2:**

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

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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 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  
Monitoring Frequency: DAILY  
Averaging Method: 6-MINUTE AVERAGE (METHOD 22)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 40: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 40.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-WEIGH

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

**Item 40.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The fabric filters will be operated in accordance with the manufacturer instructions. For each fabric filter collector equipped with a pressure gauge, the pressure drop across the device will be monitored and recorded once per shift when the emission source is operating. The pressure drop readings shall be recorded in a log with the date, time of observation and the name of the observer.

If the pressure drop is outside of the manufacturer's prescribed upper limit of 2.5 inches of water, the process and equipment must be inspected to identify the problem and to take corrective actions. The identified problem and corrective actions shall be recorded in the log. If the corrective actions do not bring the pressure drop within the correct range than the Department shall be notified within one business day.



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Emission Unit: X-OXDZR

**Item 42.2:**

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 X-OXDZR 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) 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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

**Condition 43: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**



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

**Item 43.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

**Item 43.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

**Condition 44: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**



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

**Item 44.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

**Item 44.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

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

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

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

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

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 1/30/2017.

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

**Condition 45: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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



**Item 45.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

**Item 45.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within any work area associated with a coating line, the owner or operator of a facility subject to this Subpart must:

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

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

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

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

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

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

(g) clean hand held spray guns by one of the following:

(1) an enclosed spray gun cleaning system that is kept closed when not in use;

(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(3) disassembling and cleaning of the spray gun in a vat

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that is kept closed when not in use; or  
(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

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 1/30/2017.

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

**Condition 46: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**Applicable Federal Requirement: 6 NYCRR 228-1.4 (d)**

**Item 46.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

**Item 46.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Class D pressure sensitive tape and labels coating processes, as defined in 6NYCRR Part 228, shall not operate unless:

1. Appropriate emission control requirements of 6NYCRR Part 228-1.5 have been met;
2. A process specific RACT variance has been granted in accordance with 6NYCRR Part 228-1.5(e); or
3. The facility only uses coatings with VOC contents, as applied, which do not exceed 0.067 Kg VOC/kg coating or Lb VOC/lb coating.

The VOC content limits can be met by averaging the VOC content of the materials used on a single surface coating line (i.e. daily with-in-line averaging). Materials used to form unsupported substrates, such as calendaring of vinyl, brown film, cast film, extruded film and co-extruded film are not considered coating for this purpose.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.  
The initial report is due 1/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 47: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 47.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

**Item 47.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This condition applies to the toluene recovery system (TRS) which is identified as emission source 00321.

Annual preventative maintenance will be performed on the TRS, including but not limited to, sampling and testing for apparent density, particle size distribution, and the carbon tetrachloride activity level of representative samples of carbon from the TRS.

Test results will be maintained on site for at least five years and made available to the Department upon request.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 48: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 48.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

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

**Item 48.2:**

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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 provide 100% capture and maximize the overall removal efficiency of the control devices. 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 1/30/2017.

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

**Condition 49: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Regulated Contaminant(s):

CAS No: 000108-88-3 TOLUENE

**Item 49.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This condition applies to the toluene recovery system (TRS) which is identified as emission source 00321.

IIMAK must assure compliance with the minimum overall VOC removal efficiency rate of 90% for the capture and control devices. The overall VOC removal efficiency is the product of the capture efficiency of the gas collection system and the recovery efficiency of the TRS.

**CAPTURE EFFICIENCY:**

The facility has documented 100% capture via permanent total enclosure testing for the multi-station coaters, identified as emission sources 00221, 00222, 00224, 00271, and 00311. The capture efficiency testing of the emission



sources need only be repeated, in accordance with 40CFR60, Appendix A, Method 204, if physical changes to the air distribution system occur. Physical changes to the air distribution system include, but are not limited to, adding stations to a coating line, increasing or decreasing the volumetric flow rate from the dryer (e.g., by changing the size of press fans/motors or removal or derating of dryers), and changing the static duct pressure.

**REMOVAL EFFICIENCY:**

The overall VOC removal efficiency was verified via performance testing on November 21 & 22, 2013. A performance test determining the removal efficiency of the TRS must be performed utilizing three 1-hr test runs, in accordance with 40CFR60, Appendix A, Method 18, 25, 25A, 204 or equivalent, within 180 days of permit issuance. The test must subsequently be performed once every five years, based on the date of the previous test.

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

**USE OF PERFORMANCE TEST DATA:**

Performance testing, in combination with the 100% capture provided by the documented permanent total enclosure, may determine that the TRS is providing an overall VOC removal efficiency rate greater than the required minimum 90%. IIMAK may use the higher overall VOC removal efficiency rate in VOC emission calculations if the following requirements (as stated in the Compliance Assurance Monitoring Plan (CAM) Plan prepared by Jeff Wittlinger for IIMAK and submitted via letter dated May 13, 2016) are met:

1. A MOCON 9000 Series hydrocarbon analyzer (or equivalent) serving as a process control device measuring the TRS outlet toluene concentration and a lower explosive limit (LEL) meter measuring the incoming toluene concentration must operate at all times when the TRS is in operation. The hydrocarbon analyzer must be calibrated daily using span gases of 0 ppm oxygen and 100 ppm methane (equivalent of 15.8 ppm toluene) and the LEL meter must be calibrated quarterly.
2. Whenever the TRS is operating, inlet and outlet toluene concentration readings must be collected continuously and recorded electronically; hourly averages

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must be calculated and recorded based on at least four data points per hour.

3. Carbon bed regeneration must be set to occur at an interval not to exceed 500 operating minutes, or when the outlet concentration reaches 10 ppm, whichever comes first.

Lower Permit Limit: 90 percent reduction by weight

Reference Test Method: EPA RM 18, 25, 25A, 204 or equivalent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

**Condition 50: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 50.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This condition applies to the regenerative thermal oxidizer (identified as Oxidizer #4/emission source 0004A) and two recuperative oxidizers (identified as Oxidizer #2/emission source 0002A and Oxidizer #3/emission source 0003A).

IIMAK must assure compliance with the minimum overall VOC removal efficiency rate of 90% for the capture and control devices. The overall VOC removal efficiency is the product of the capture efficiency of the gas collection system and the destruction efficiency of the oxidizer(s).

**CAPTURE EFFICIENCY:**

The facility has documented 100% capture via permanent total enclosure testing for the multi-station coaters, identified as emission sources 00221, 00222, 00224, 00271,



and 00311. The capture efficiency testing of the emission sources need only be repeated, in accordance with 40CFR60, Appendix A, Method 204, if physical changes to the air distribution system occur. Physical changes to the air distribution system include, but are not limited to, adding stations to a coating line, increasing or decreasing the volumetric flow rate from the dryer (e.g., by changing the size of press fans/motors or removal or derating of dryers), and changing the static duct pressure.

**DESTRUCTION EFFICIENCY:**

The overall VOC removal efficiency must be verified via performance testing. The performance test determining the destruction efficiency of Oxidizers #2, 3, & 4 must be performed utilizing three 1-hr test runs, in accordance with 40CFR60, Appendix A, Method 18, 25, 25A, 204 or equivalent, within 180 days of permit issuance.

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

The test must subsequently be performed once every five years, based on the date of the previous test.

**USE OF PERFORMANCE TEST DATA:**

Performance testing, in combination with the 100% capture provided by the documented permanent total enclosure, may determine that an oxidizer is providing an overall VOC removal efficiency rate greater than the minimum 90% requirement. IIMAK may use the higher overall VOC removal efficiency rate in emission calculations if the following requirements are met:

1. The oxidizer combustion chamber temperature must be maintained at or above the temperature recorded during the most recent performance test for the specific oxidizer at all times during operation.
2. A continuous monitor(s) to measure the combustion chamber temperature(s) of each oxidizer must be installed, periodically calibrated, and operated at all times during oxidizer operation. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. Continuous chart recordings and calibration data shall be maintained on-site for a period of 5 years and be made available for review upon request



by the Department.

Lower Permit Limit: 90 percent reduction by weight  
Reference Test Method: EPA Method 18, 25, 25A, 204 or equivalent  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 51: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

**Applicable Federal Requirement: 6 NYCRR 228-1.6 (f) (1)**

**Item 51.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

**Item 51.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This condition applies to the regenerative thermal oxidizer (identified as Oxidizer #4/emission source 0004A) and two recuperative oxidizers (identified as Oxidizer #2/emission source 0002A and Oxidizer #3/emission source 0003A).

IIMAK uses overall VOC removal efficiencies for each oxidizer (as determined by performance testing and permanent total enclosure testing) in the calculation of actual annual VOC emissions on a 12-month rolling total basis, which is required for verification of compliance with VOC emission limits per 6 NYCRR 201-7. These overall VOC removal efficiencies are typically greater than the minimum 90% control efficiency required per 6 NYCRR Part 228-1.5(c).

Therefore, operating temperature/destruction efficiency (DE) association(s) intended for use in the actual VOC emission calculation must be established via EPA Reference Method performance testing consisting of three 1-hr test runs which will be conducted within 180 days of permit issuance. The associations to be used prior to the testing are from the Emission Survey Report prepared by Empire Stack Testing, LLC, for testing performed on December 8 & 9, 2015:



Oxidizer #2: 96.5% DE at 1582 degrees F or 97.6% at 1695 degrees F,  
Oxidizer #3: 99.6% DE at 1594 degrees F,  
Oxidizer #4: 96.4% DE at 1561 degrees F or 97.5% at 1615 degrees F.

When temperatures fall below the approved performance test combustion temperature, immediate action must be taken to restore control equipment to its proper operating temperature. Malfunctions are covered by a separate condition under 6 NYCRR Part 201-1.4.

Monitoring Frequency: CONTINUOUS  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 52: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 52.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

**Item 52.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

This condition applies to the toluene recovery system (TRS) which is identified as emission source 00321.

A MOCON 9000 Series hydrocarbon analyzer (or equivalent) serves as a process control device (PCD) measuring the TRS outlet concentration and is operated at all times that the associated TRS is operated. Calibration of the PCD, using certified calibration gasses of 0 ppm oxygen and 100 ppm methane (equivalent of 15.8 ppm toluene), will be completed on a daily basis. Calibration information, along with any variation from the setpoint before resetting, will be recorded in a log book.

Monitoring for breakthrough on each operating bed of the TRS will take place according to the procedures stated in the Compliance Assurance Monitoring (CAM) Plan prepared by Jeff Wittlinger for IIMAK and submitted via letter dated May 13, 2016. The CAM plan states that under normal

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operating conditions, the interval between carbon bed steaming is set at no more than 500 minutes or 10 ppm, whichever comes first. Under upset conditions the high alarm is set for 35 ppm and the system automatic shutdown is set at 99 ppm.

The data acquisition system (DAS) collects the outlet VOC concentration at a rate of a minimum of four data points per hour, and records and retains 1-hr averages.

Calibration information and DAS data will be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

**Condition 53: Compliance Certification**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 53.1:**

The Compliance Certification activity will be performed for:

Emission Unit: X-OXDZR

**Item 53.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

The CAM Plan for the toluene recovery system, prepared by Jeff Wittlinger for IIMAK, was received via email on March 2, 2016. It has been approved via the issuance of this permit and is incorporated into the permit via conditions per 6 NYCRR Part 228-1.



The CAM Plan for the oxidizers, prepared by Jeff Wittlinger for IIMAK, was received via email on May 13, 2016. This Plan must be revised within 30 days of permit issuance to reflect the permit requirement to maintain a minimum, not hourly average, operating temperature.

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

In addition to the semi-annual reporting requirements of 6 NYCRR Part 201-6.4(c)(3)(ii) as outlined elsewhere in permit conditions, IIMAK must, to satisfy the reporting requirements of 40CFR Part 64.9, include information with those semi-annual reports which summarizes:

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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



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

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

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

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

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

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

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

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

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

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

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

**Item B: 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



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

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

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

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

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

**Condition 56: Compliance Demonstration**  
**Effective between the dates of 10/25/2016 and 10/24/2021**

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

**Item 56.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: X-OXDZR

**Item 56.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK has instituted a Startup Shutdown Malfunction (SSM)



Plan in case of control technology (oxidizer or toluene recovery system (TRS)) malfunction. The Plan includes the following actions:

1. IIMAK will keep an inventory of spare parts for the control technologies 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 a control technology (oxidizer or TRS) indicates signs of a malfunction.
3. Maintenance staff will immediately respond to any control technology malfunctions and dedicate the resources necessary to repair the units, 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 cannot be repaired in house, IIMAK will immediately notify and mobilize the appropriate outside agencies to correct the malfunction.
5. Once an oxidizer malfunction is identified that will extend beyond a one hour time period, IIMAK production supervisors will initiate the start-up of one of the oxidizer back-up systems (i.e. Oxidizer 2 for Plant No. 1 and Oxidizer 3 for Plant No. 2). Note that the TRS automatically switches to Oxidizer No. 4 which serves as the back-up system for the TRS.
6. If maintenance has not corrected the malfunction within 4 hours of the time of the malfunction event or prior to the back-up oxidizer reaching its' operational temperature, the coaters will either be rerouted to the appropriate backup unit or shut down. Note that a four (4) hour time period is equivalent to the duration of the longest running product roll.
7. VOC emissions will be quantified, via mass balance calculations, during the malfunction period and accounted for in monthly emission totals.

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 1/30/2017.



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