

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



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1422-00093/00038
Effective Date: 02/07/2002 Expiration Date: No expiration date

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

Contact: JEFFREY A WITTLINGER
IIMAK
310 COMMERCE DRIVE
BUFFALO, NY 14228
(716) 691-6333

Facility: INTERNATIONAL IMAGING
310 COMMERCE DRIVE
AMHERST, NY 14228

Contact: JEFFREY A WITTLINGER
IIMAK
310 COMMERCE DRIVE
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.

IIMAK was issued a Title V Permit on February 22, 2001. This Air State Facility (ASF) Permit allows the construction and operation of a new emission unit, 4-OXDZR, in Plant 2. 4-OXDZR includes a new coating machine MSC-4 and a new 60,000 cfm regenerative oxidizer which is designated Oxidizer 4. Oxidizer 4 will also receive the exhaust from three coating machines, MSC-1 through 3, and a solvent cleaning operation which currently exhaust through Oxidizer 3. Oxidizer 3 will become a backup unit.

This project is subject to 6NYCRR Subpart 231-2 New Source Review. This ASF permit imposes a volatile organic compounds (VOC) emission cap of less than 40 tons per year on the new emission source (coating machine MSC-4, designated emission source 00271). The 50 tons per year VOC emission cap imposed by the facility's Title V permit remains 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 will now be routed to Oxidizer 4.

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



IIMAK is required by this permit to perform a stack test on Oxidizer 4 to determine compliance with the VOC control requirements of 6NYCRR Part 228.3 and to determine certain operating parameters, such as minimum oxidizer temperature. The stack test must be completed within 180 days of oxidizer startup. IIMAK is also required to analyze the oxidizer's destruction efficiency annually after the initial performance test.

The new emission unit is subject to 6 NYCRR Part 228 - Table 1 and uses Oxidizer 4 to reduce VOC emissions to permitted levels. Each continuous-roll coating machine is totally enclosed so that all of the VOC-containing emissions from the machines are piped to the oxidizer for destruction. IIMAK is required to keep records which document the amount of VOCs emitted on a 12-month rolling total. IIMAK is also required to annually certify that emission unit 4-OXDZR has been in continuous compliance with its 40 ton per year VOC emission cap.

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: RICHARD P SWEENEY
 DIVISION OF ENVIRONMENTAL PERMITS
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9
HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

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

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



Item 4.1:

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

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

****** Facility Level ******

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

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

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

Facility: INTERNATIONAL IMAGING
310 COMMERCE DRIVE
AMHERST, NY 14228

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

Permit Effective Date: 02/07/2002

Permit Expiration Date: No expiration date.



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 14 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 3 6NYCRR 200.7: Maintenance of equipment
- 6 6NYCRR 201-1.7: Recycling and Salvage
- 7 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the Air
- 9 6NYCRR 201-3.2(a): Proof of Eligibility
- 10 6NYCRR 201-3.3(a): Proof of Eligibility
- 12 6NYCRR 202-1.1: Required emissions tests
- 13 6NYCRR 211.3: Visible emissions limited.
- 1 6NYCRR 200.5: Sealing
- 2 6NYCRR 200.6: Acceptable ambient air quality
- 4 6NYCRR 201-1.2: Unpermitted Emission Sources
- 5 6NYCRR 201-1.5: Emergency Defense
- 8 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 11 6NYCRR 201-6.3(a)(2): Title V Permit - Modification Application
- 15 6NYCRR 228.5(a): Compliance Demonstration
- 16 6NYCRR 231-2: Facility Permissible Emissions
- 17 6NYCRR 231-2: Compliance Demonstration
- *18 6NYCRR 231-2: Compliance Demonstration

Emission Unit Level

EU=4-OXDZR

- 19 6NYCRR 228.3: Oxidizer Overall Removal Efficiency
- 20 6NYCRR 228.3: Compliance Demonstration
- 21 6NYCRR 228.3: Compliance Demonstration
- 22 6NYCRR 228.3: Compliance Demonstration
- 23 6NYCRR 228.5(f): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 24 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 25 6NYCRR 201-5: General Provisions
- 26 6NYCRR 201-5: Permit Exclusion Provisions
- 27 6NYCRR 201-5: Emission Unit Definition
- 28 6NYCRR 201-5.3(b): Contaminant List
- 29 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 30 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 31 6NYCRR 201-5: Process Definition By Emission Unit

EU=4-OXDZR

New York State Department of Environmental Conservation
Permit ID: 9-1422-00093/00038 Facility DEC ID: 9142200093



32 6NYCRR 201-1.4: Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

Condition 14: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 14.1:

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

Condition 3: Maintenance of equipment
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 3.1:

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 6: Recycling and Salvage
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 6.1:

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

Condition 7: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 7.1:

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 9: Proof of Eligibility
Effective between the dates of 02/07/2002 and Permit Expiration Date



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

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

Item 9.1:

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

Condition 10: Proof of Eligibility

Effective between the dates of 02/07/2002 and Permit Expiration Date

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

Item 10.1:

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

Condition 12: Required emissions tests

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 12.1:

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

Condition 13: Visible emissions limited.

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 13.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



minute period per hour of not more than 57 percent opacity.

Condition 1: Sealing
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

(a) The commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the commissioner issued in the case of the violation. Sealing means labelling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

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

Condition 4: Unpermitted Emission Sources
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 4.1:

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

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



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

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

Condition 5: Emergency Defense
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 5.1:

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

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

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

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

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

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

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

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

Condition 8: Public Access to Recordkeeping
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.10(a)

Item 8.1:

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Condition 11: Title V Permit - Modification Application
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.3(a)(2)

Item 11.1:

A Title V permit modification application must be submitted to the Department within one year of commencement of operation of the new emission unit, emission source or process that required the modification.

Condition 15: Compliance Demonstration
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Certification from the coating supplier/manufacture which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the department. Records must be maintained at the facility for a period of five years.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

Condition 16: Facility Permissible Emissions
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



Item 16.1:

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

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

CAS No: 0NY998-00-0

PTE: 76,000 pounds per year

Name: VOC

Condition 17: Compliance Demonstration

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will track usage/consumption and maintain records showing the quantity of all materials which contain VOCs used by coating machine MSC-4 (emission source 00271). 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: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

Condition 18: Compliance Demonstration

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IIMAK will not exceed an emission rate of 40 tons of VOCs per 12 month period for coating machine MSC-4 which is designated emission source 00271. Compliance will be determined on an annual maximum rolled monthly basis.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 38 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

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

Condition 19: Oxidizer Overall Removal Efficiency

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3

Item 19.1:

This Condition applies to Emission Unit: 4-OXDZR

Item 19.2:

IIMAK will maintain and operate the thermal oxidizer at 85% overall removal efficiency whenever the coating lines are in use. This requires the maintenance of the total enclosure structures at each coater and 85% destruction efficiency at the oxidizer. IIMAK will develop and implement an operational plan for maintaining total enclosure at each coater. Oxidizer minimum operating temperature will be the surrogate compliance parameter for overall removal efficiency



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

and it will be determined by the stack test to be performed on Oxidizer 4 after startup.

Condition 20: Compliance Demonstration

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-OXDZR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will maintain a permanent total enclosure around each coater to maximize the overall removal efficiency of the thermal oxidizer. 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: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-OXDZR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 21.2:

Compliance Demonstration shall include the following monitoring:



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

Condition 22: Compliance Demonstration
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-OXDZR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will annually analyze the oxidizer's destruction efficiency beginning in the calendar year following Oxidizer 4's initial performance test. A organic vapor analyzer employing a flame ionization detector will be used to measure the total concentration of VOCs in the inlet and outlet air streams of the oxidizer.

The performance specifications of the monitoring instrument will be approved by the Department prior to use. The instrument will be capable of accurately measuring and displaying readings at the anticipated

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



inlet/outlet concentrations. The instrument will be maintained, calibrated and operated according to manufacturer's specifications, or as specified by the Department.

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

Destruction efficiency tests will be conducted at emission point 00027 once each calendar year, within the six months prior to the annual shutdown/ inspection of the oxidizer. IIMAK will send the test results to the Department after each test. If, at any time, IIMAK or the Department has cause to believe that the oxidizer is not performing at the last measured destruction efficiency, IIMAK will make appropriate adjustments and/or repairs to the oxidizers to improve destruction efficiencies and will retest. Oxidizer emission calculations (rolling 12-month total) will be based on the latest destruction efficiency measurements.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Condition 23: Compliance Demonstration
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(f)

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-OXDZR

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

Item 23.2:

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

To demonstrate compliance with the requirements of 6 NYCRR Part 228.3 for VOC emission control an initial compliance demonstration will be conducted on the exhaust of Oxidizer 4 within 180 days of oxidizer startup. A stack test protocol must be submitted to the Department and approved prior to testing. After protocol approval, IIMAK must notify the Department of the proposed test date.

Depending upon the conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 must be used when measuring volatile organic compound (VOC) concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

- (a) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography,
- (b) Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon,
- (c) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.
- (d) Methods not listed above must be approved in advance by the commissioner's representative and the United States Environmental Protection Agency.

The stack test will be used to establish oxidizer operating parameters, such as minimum oxidizer temperature. The permit will then be modified to include the operating parameters as enforceable permit limits.

The stack test results must be submitted to the Department within 60 days of the test date.

Lower Permit Limit: 85 percent

Reference Test Method: See description

Monitoring Frequency: SINGLE OCCURRENCE

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



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



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

Condition 24: Unavoidable noncompliance and violations
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 24.1:

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

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

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

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

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

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

Condition 25: General Provisions

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 25.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 25.2:

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

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.

Condition 26: Permit Exclusion Provisions

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 26.1:

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 currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant 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 by the Department and the receipt thereof by the Applicant does not



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

supercede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements contained in such order or modification thereof unless specifically intended by this permit.

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 the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not addressed in this permit.

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 the right of the Department to pursue any claims for natural resource damages against the Applicant.

Condition 27: Emission Unit Definition
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 27.1:

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

Emission Unit: 4-OXDZR End Date: 06/05/2003

Emission Unit Description:

Solvent-based ink application and curing onto polyester film. Coating Machine MSC-4 will vent to Thermal Oxidizer No. 4 (60,000 CFM with natural gas burner).

Building(s): 2

Condition 28: Contaminant List
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5.3(b)

Item 28.1:

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

CAS No: 0NY998-00-0

Name: VOC

Condition 29: Air pollution prohibited
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



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.

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

Condition 30: Emission Point Definition By Emission Unit
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 30.1:

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

Emission Unit: 4-OXDZR

Emission Point: 00027

Height (ft.): 44

Diameter (in.): 65

NYTMN (km.): 4770.1

NYTME (km.): 190.1

Building: 2

Condition 31: Process Definition By Emission Unit
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 31.1:

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

Emission Unit: 4-OXDZR

Process: OX4

Source Classification Code: 3-90-006-89

Process End Date: 6/5/2003

Process Description:

Process consists of the MSC-4 coating machine. Machine No. MSC-4 applies VOC-containing ink to polyester film and then cures the coating. This unit is vented to Oxidizer No. 4 (60,000 CFM w/ natural gas burner).

Emission Source/Control: 0004A - Control

Control Type: HEATED CERAMIC MEDIA

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



Emission Source/Control: 00271 - Process

Condition 32: Compliance Demonstration

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 32.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-OXDZR

Item 32.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

1. IIMAK will keep an inventory of spare parts for the oxidizer 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 the oxidizer indicates signs of a malfunction.
3. Maintenance staff will immediately respond to any oxidizer malfunction conditions and dedicate the resources necessary to repair the oxidizer, in house, in the shortest period of time practical.
4. In the event that the malfunction is due to a utility provider or a malfunction of a component itself that can not be repaired in house, IIMAK will immediately notify and mobilize the appropriate outside agencies to correct the malfunction.
5. The shift supervisor will be contacted to determine facility status relative to existing cap limits. The shift supervisor will compare the 12 month rolling VOC total for each plant with the cap limits to determine if any coating can be performed after the current roll is

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



finished.

6. Once an oxidizer malfunction is identified that will extend beyond the time period associated with finishing the roll being coated on each machine, IIMAK production supervisors will move low-VOC or waxed based film production to the coating machines impacted by the oxidizer malfunction, to the extent practical.

7. VOC emissions will be monitored via mass balance calculations during the malfunction period and compared with cap levels to ensure compliance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

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



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1422-00093/00038
Effective Date: 02/07/2002 Expiration Date: No expiration date

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

Contact: JEFFREY A WITTLINGER
IIMAK
310 COMMERCE DRIVE
BUFFALO, NY 14228
(716) 691-6333

Facility: INTERNATIONAL IMAGING
310 COMMERCE DRIVE
AMHERST, NY 14228

Contact: JEFFREY A WITTLINGER
IIMAK
310 COMMERCE DRIVE
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.

IIMAK was issued a Title V Permit on February 22, 2001. This Air State Facility (ASF) Permit allows the construction and operation of a new emission unit, 4-OXDZR, in Plant 2. 4-OXDZR includes a new coating machine MSC-4 and a new 60,000 cfm regenerative oxidizer which is designated Oxidizer 4. Oxidizer 4 will also receive the exhaust from three coating machines, MSC-1 through 3, and a solvent cleaning operation which currently exhaust through Oxidizer 3. Oxidizer 3 will become a backup unit.

This project is subject to 6NYCRR Subpart 231-2 New Source Review. This ASF permit imposes a volatile organic compounds (VOC) emission cap of less than 40 tons per year on the new emission source (coating machine MSC-4, designated emission source 00271). The 50 tons per year VOC emission cap imposed by the facility's Title V permit remains 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 will now be routed to Oxidizer 4.

FINAL

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



IIMAK is required by this permit to perform a stack test on Oxidizer 4 to determine compliance with the VOC control requirements of 6NYCRR Part 228.3 and to determine certain operating parameters, such as minimum oxidizer temperature. The stack test must be completed within 180 days of oxidizer startup. IIMAK is also required to analyze the oxidizer's destruction efficiency annually after the initial performance test.

The new emission unit is subject to 6 NYCRR Part 228 - Table 1 and uses Oxidizer 4 to reduce VOC emissions to permitted levels. Each continuous-roll coating machine is totally enclosed so that all of the VOC-containing emissions from the machines are piped to the oxidizer for destruction. IIMAK is required to keep records which document the amount of VOCs emitted on a 12-month rolling total. IIMAK is also required to annually certify that emission unit 4-OXDZR has been in continuous compliance with it's 40 ton per year VOC emission cap.

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: RICHARD P SWEENEY
 DIVISION OF ENVIRONMENTAL PERMITS
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9
HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

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

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



Item 4.1:

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

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

****** Facility Level ******

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

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

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

Facility: INTERNATIONAL IMAGING
310 COMMERCE DRIVE
AMHERST, NY 14228

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

Permit Effective Date: 02/07/2002

Permit Expiration Date: No expiration date.



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 14 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 3 6NYCRR 200.7: Maintenance of equipment
- 6 6NYCRR 201-1.7: Recycling and Salvage
- 7 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the Air
- 9 6NYCRR 201-3.2(a): Proof of Eligibility
- 10 6NYCRR 201-3.3(a): Proof of Eligibility
- 12 6NYCRR 202-1.1: Required emissions tests
- 13 6NYCRR 211.3: Visible emissions limited.
- 1 6NYCRR 200.5: Sealing
- 2 6NYCRR 200.6: Acceptable ambient air quality
- 4 6NYCRR 201-1.2: Unpermitted Emission Sources
- 5 6NYCRR 201-1.5: Emergency Defense
- 8 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 11 6NYCRR 201-6.3(a)(2): Title V Permit - Modification Application
- 15 6NYCRR 228.5(a): Compliance Demonstration
- 16 6NYCRR 231-2: Facility Permissible Emissions
- 17 6NYCRR 231-2: Compliance Demonstration
- *18 6NYCRR 231-2: Compliance Demonstration

Emission Unit Level

EU=4-OXDZR

- 19 6NYCRR 228.3: Oxidizer Overall Removal Efficiency
- 20 6NYCRR 228.3: Compliance Demonstration
- 21 6NYCRR 228.3: Compliance Demonstration
- 22 6NYCRR 228.3: Compliance Demonstration
- 23 6NYCRR 228.5(f): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 24 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 25 6NYCRR 201-5: General Provisions
- 26 6NYCRR 201-5: Permit Exclusion Provisions
- 27 6NYCRR 201-5: Emission Unit Definition
- 28 6NYCRR 201-5.3(b): Contaminant List
- 29 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 30 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 31 6NYCRR 201-5: Process Definition By Emission Unit

EU=4-OXDZR

New York State Department of Environmental Conservation
Permit ID: 9-1422-00093/00038 Facility DEC ID: 9142200093



32 6NYCRR 201-1.4: Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

Condition 14: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 14.1:

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

Condition 3: Maintenance of equipment
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 3.1:

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 6: Recycling and Salvage
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 6.1:

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

Condition 7: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 7.1:

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 9: Proof of Eligibility
Effective between the dates of 02/07/2002 and Permit Expiration Date



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

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

Item 9.1:

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

Condition 10: Proof of Eligibility

Effective between the dates of 02/07/2002 and Permit Expiration Date

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

Item 10.1:

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

Condition 12: Required emissions tests

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 12.1:

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

Condition 13: Visible emissions limited.

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 13.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



minute period per hour of not more than 57 percent opacity.

Condition 1: Sealing
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

(a) The commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the commissioner issued in the case of the violation. Sealing means labelling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

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

Condition 4: Unpermitted Emission Sources
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 4.1:

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

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



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

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

Condition 5: Emergency Defense
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 5.1:

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

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

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

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

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

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

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

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

Condition 8: Public Access to Recordkeeping
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.10(a)

Item 8.1:

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Condition 11: Title V Permit - Modification Application
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.3(a)(2)

Item 11.1:

A Title V permit modification application must be submitted to the Department within one year of commencement of operation of the new emission unit, emission source or process that required the modification.

Condition 15: Compliance Demonstration
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the department. Records must be maintained at the facility for a period of five years.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

Condition 16: Facility Permissible Emissions
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



Item 16.1:

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

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

CAS No: 0NY998-00-0

PTE: 76,000 pounds per year

Name: VOC

Condition 17: Compliance Demonstration

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will track usage/consumption and maintain records showing the quantity of all materials which contain VOCs used by coating machine MSC-4 (emission source 00271). 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: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

Condition 18: Compliance Demonstration

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IIMAK will not exceed an emission rate of 40 tons of VOCs per 12 month period for coating machine MSC-4 which is designated emission source 00271. Compliance will be determined on an annual maximum rolled monthly basis.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 38 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

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

Condition 19: Oxidizer Overall Removal Efficiency

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3

Item 19.1:

This Condition applies to Emission Unit: 4-OXDZR

Item 19.2:

IIMAK will maintain and operate the thermal oxidizer at 85% overall removal efficiency whenever the coating lines are in use. This requires the maintenance of the total enclosure structures at each coater and 85% destruction efficiency at the oxidizer. IIMAK will develop and implement an operational plan for maintaining total enclosure at each coater. Oxidizer minimum operating temperature will be the surrogate compliance parameter for overall removal efficiency



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

and it will be determined by the stack test to be performed on Oxidizer 4 after startup.

Condition 20: Compliance Demonstration

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-OXDZR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will maintain a permanent total enclosure around each coater to maximize the overall removal efficiency of the thermal oxidizer. 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: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-OXDZR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 21.2:

Compliance Demonstration shall include the following monitoring:



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

Condition 22: Compliance Demonstration
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-OXDZR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IIMAK will annually analyze the oxidizer's destruction efficiency beginning in the calendar year following Oxidizer 4's initial performance test. A organic vapor analyzer employing a flame ionization detector will be used to measure the total concentration of VOCs in the inlet and outlet air streams of the oxidizer.

The performance specifications of the monitoring instrument will be approved by the Department prior to use. The instrument will be capable of accurately measuring and displaying readings at the anticipated



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

inlet/outlet concentrations. The instrument will be maintained, calibrated and operated according to manufacturer's specifications, or as specified by the Department.

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

Destruction efficiency tests will be conducted at emission point 00027 once each calendar year, within the six months prior to the annual shutdown/ inspection of the oxidizer. IIMAK will send the test results to the Department after each test. If, at any time, IIMAK or the Department has cause to believe that the oxidizer is not performing at the last measured destruction efficiency, IIMAK will make appropriate adjustments and/or repairs to the oxidizers to improve destruction efficiencies and will retest. Oxidizer emission calculations (rolling 12-month total) will be based on the latest destruction efficiency measurements.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Condition 23: Compliance Demonstration
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(f)

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-OXDZR

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

Item 23.2:

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

To demonstrate compliance with the requirements of 6 NYCRR Part 228.3 for VOC emission control an initial compliance demonstration will be conducted on the exhaust of Oxidizer 4 within 180 days of oxidizer startup. A stack test protocol must be submitted to the Department and approved prior to testing. After protocol approval, IIMAK must notify the Department of the proposed test date.

Depending upon the conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 must be used when measuring volatile organic compound (VOC) concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

- (a) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography,
- (b) Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon,
- (c) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.
- (d) Methods not listed above must be approved in advance by the commissioner's representative and the United States Environmental Protection Agency.

The stack test will be used to establish oxidizer operating parameters, such as minimum oxidizer temperature. The permit will then be modified to include the operating parameters as enforceable permit limits.

The stack test results must be submitted to the Department within 60 days of the test date.

Lower Permit Limit: 85 percent

Reference Test Method: See description

Monitoring Frequency: SINGLE OCCURRENCE

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



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



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

Condition 24: Unavoidable noncompliance and violations
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 24.1:

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

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

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

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

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

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

Condition 25: General Provisions

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 25.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 25.2:

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

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.

Condition 26: Permit Exclusion Provisions

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 26.1:

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 currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant 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 by the Department and the receipt thereof by the Applicant does not



New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093

supercede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements contained in such order or modification thereof unless specifically intended by this permit.

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 the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not addressed in this permit.

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 the right of the Department to pursue any claims for natural resource damages against the Applicant.

Condition 27: Emission Unit Definition
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 27.1:

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

Emission Unit: 4-OXDZR End Date: 06/05/2003

Emission Unit Description:

Solvent-based ink application and curing onto polyester film. Coating Machine MSC-4 will vent to Thermal Oxidizer No. 4 (60,000 CFM with natural gas burner).

Building(s): 2

Condition 28: Contaminant List
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5.3(b)

Item 28.1:

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

CAS No: 0NY998-00-0

Name: VOC

Condition 29: Air pollution prohibited
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



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.

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

Condition 30: Emission Point Definition By Emission Unit
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 30.1:

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

Emission Unit: 4-OXDZR

Emission Point: 00027

Height (ft.): 44

Diameter (in.): 65

NYTMN (km.): 4770.1

NYTME (km.): 190.1

Building: 2

Condition 31: Process Definition By Emission Unit
Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 31.1:

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

Emission Unit: 4-OXDZR

Process: OX4

Source Classification Code: 3-90-006-89

Process End Date: 6/5/2003

Process Description:

Process consists of the MSC-4 coating machine. Machine No. MSC-4 applies VOC-containing ink to polyester film and then cures the coating. This unit is vented to Oxidizer No. 4 (60,000 CFM w/ natural gas burner).

Emission Source/Control: 0004A - Control

Control Type: HEATED CERAMIC MEDIA

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



Emission Source/Control: 00271 - Process

Condition 32: Compliance Demonstration

Effective between the dates of 02/07/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 32.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-OXDZR

Item 32.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

1. IIMAK will keep an inventory of spare parts for the oxidizer 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 the oxidizer indicates signs of a malfunction.
3. Maintenance staff will immediately respond to any oxidizer malfunction conditions and dedicate the resources necessary to repair the oxidizer, in house, in the shortest period of time practical.
4. In the event that the malfunction is due to a utility provider or a malfunction of a component itself that can not be repaired in house, IIMAK will immediately notify and mobilize the appropriate outside agencies to correct the malfunction.
5. The shift supervisor will be contacted to determine facility status relative to existing cap limits. The shift supervisor will compare the 12 month rolling VOC total for each plant with the cap limits to determine if any coating can be performed after the current roll is

New York State Department of Environmental Conservation

Permit ID: 9-1422-00093/00038

Facility DEC ID: 9142200093



finished.

6. Once an oxidizer malfunction is identified that will extend beyond the time period associated with finishing the roll being coated on each machine, IIMAK production supervisors will move low-VOC or waxed based film production to the coating machines impacted by the oxidizer malfunction, to the extent practical.

7. VOC emissions will be monitored via mass balance calculations during the malfunction period and compared with cap levels to ensure compliance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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