



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-2926-00097/00003  
Effective Date: 04/20/2015 Expiration Date: 04/19/2025

Permit Issued To: BISON BAG CO INC  
5404 CROWN DR  
LOCKPORT, NY 14094

Contact: JAMES G STREICHER  
BISON BAG CO INC  
5404 CROWN DR  
LOCKPORT, NY 14094  
(716) 434-4380

Facility: BISON BAG CO INC  
5404 CROWN DR  
LOCKPORT, NY 14094

Contact: JAMES G STREICHER  
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LOCKPORT, NY 14094  
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**Description:**

Bison Bag Bison Bag, located in Lockport, New York is a commercial printer of flexible poly and plastic packaging predominately for the food industry. This permit represents the replacement and updating of information regarding the flexographic presses. Inks and adhesives are applied to raw materials to print, coat, laminate and bond different materials in layers. The facility currently operates two flexographic printing presses, a laminator, and hot-knife cutting machines. The main sources of air emissions are the volatile organic compounds (VOCs) from the solvent based inks utilized on the facility's flexographic presses. Solvent used is normal propyl alcohol or normal propyl acetate. The facility utilizes inks for its presses which do not contain hazardous air pollutants (HAPs).

Bison Bag will limit potential emissions of total volatile organic compounds (VOC) to less than 50 tons during any consecutive twelve month period in order to cap out of the major source Title V permitting requirements of 6NYCRR, Part 201-6, the control requirements of 6NYCRR, Part 234-3(a)(1)(i) for Graphic Arts Printing facilities and the Reasonably Available Control Technology (RACT) requirements of 6NYCRR, Part 212.10. The permittee will also be established as a minor source for 6NYCRR, Part 231-2, New Source Review in a Non-Attainment Area and will not be subject to the provisions of that subpart unless future modifications are major by themselves.



A regenerative thermal oxidizer (RTO) is used to control VOC emissions from the Uteco Onyx 808 press installed in 2010 and a Uteco Onyx 107 press installed in 2013. These presses having total drum enclosure replaced existing presses and will have a greater overall control efficiency of 98% potential VOC.

The permittee will limit VOC emissions through the use of a regenerative thermal oxidizer (RTO) having an overall control efficiency (capture and control) of 98% and operating at a minimum temperature of 1450 degrees F.

Adhesives which are applied to film by a metered roller in the lamination process contain isocyanates. The isocyanates have been evaluated as Highly Toxic 'A' rated contaminant pursuant to 6NYCRR, Part 212.4(b) and the annual and short-term emission impacts modeled using conservative emissions estimates and AERSCREEN in accordance with Air Guide-1 guidance. There are no other VOCs contained in the two-part formulation.

A solvent recovery unit (still) recovers waste solvents and inks which are then used for cleaning purposes.

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

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

DEC Permit Conditions  
Renewal 2/FINAL



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



**Notification of Other State Permittee Obligations**

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

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

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

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

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

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

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



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

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

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

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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



**Condition 4: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

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

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

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

**Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2915  
(716) 851-7165

**New York State Department of Environmental Conservation**

Permit ID: 9-2926-00097/00003

Facility DEC ID: 9292600097



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: BISON BAG CO INC  
5404 CROWN DR  
LOCKPORT, NY 14094

Facility: BISON BAG CO INC  
5404 CROWN DR  
LOCKPORT, NY 14094

Authorized Activity By Standard Industrial Classification Code:  
2759 - COMMERCIAL PRINTING, NEC

Permit Effective Date: 04/20/2015

Permit Expiration Date: 04/19/2025



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- \*2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 4 6 NYCRR 211.1: Air pollution prohibited
- 5 6 NYCRR 234.6: Compliance Demonstration
- 6 6 NYCRR 234.7: Compliance Demonstration
- 7 6 NYCRR 234.8: Compliance Demonstration
- 8 40CFR 63.829(b), Subpart KK: Compliance Demonstration
- 9 40CFR 63.830(b)(1), Subpart KK: Compliance Demonstration

#### Emission Unit Level

- 10 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

#### EU=0-00001,Proc=002

- 11 6 NYCRR 212.4 (b): Compliance Demonstration

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 12 ECL 19-0301: Contaminant List
- 13 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 14 6 NYCRR Subpart 201-5: Emission Unit Definition
- 15 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 16 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 17 6 NYCRR 211.2: Visible Emissions Limited

#### Emission Unit Level

- 18 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 19 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

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

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

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



required to operate such device effectively.

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

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

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

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

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



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

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

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

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

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

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

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

**Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)**

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

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



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

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

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

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

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

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

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

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 1: Facility Permissible Emissions**



Effective between the dates of 04/20/2015 and 04/19/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

**Item 1.1:**

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

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

CAS No: 0NY998-00-0

PTE: 99,000 pounds per year

Name: VOC

**Condition 2: Capping Monitoring Condition**

Effective between the dates of 04/20/2015 and 04/19/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

**Item 2.1:**

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

6 NYCRR 201-6.1

6 NYCRR 212.10 (a) (2)

6 NYCRR 231-2.2

6 NYCRR 234.3 (a) (1) (i)

**Item 2.2:**

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

**Item 2.3:**

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

**Item 2.4:**

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

**Item 2.5:**

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



**Item 2.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 2.7:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The permittee shall continuously monitor and record the combustion chamber temperature of the regenerative thermal oxidizer (RTO), when the presses are operating, using a programmable logic controller to ensure operation at a minimum temperature of 1450 °F.

The combustion chamber temperature will be recorded on a continuous paper chart or electronically at least once every 15 minutes. For any instance in which the oxidizer operates below this temperature, the permittee shall immediately identify, correct or repair any malfunction and record in a log book the cause of the problem and the corrective action initiated to remedy operation outside the acceptable range.

The permittee shall physically verify the operation of the temperature recording device at least once each operating day to verify that it is working and recording properly. A written record of the daily verifications shall be maintained in a log.

The permittee shall operate and maintain the regenerative thermal oxidizer at all times that the presses are in operation. A bypass of the RTO will only be allowed if there is an excusable malfunction.

The permittee shall record all bypasses of the RTO. The bypass cause, duration and corrective action taken shall be recorded and reported to the NYSDEC Region 9 office. Such bypasses do not include initial start-up of control equipment or during the times when the presses are operating and applying inks and solvents that did not contain VOC.

The permittee shall conduct annual inspections of the external structural integrity of the regenerative thermal oxidizer and corresponding ductwork to ensure proper operation. The permittee shall also conduct annual







Technology Requirements (RACT) of 6NYCRR, Part 212.10; and the control requirements of 6NYCRR, Part 234.3. The facility will also be established as a minor source for 6NYCRR, Part 231-2, New Source Review in a Non-Attainment Area and will not be subject to the provisions of that subpart unless future modifications are major by themselves.

The permittee will limit (VOC) emissions through the use of a regenerative thermal oxidizer (RTO) having a control efficiency of 98%, (as provided by the manufacturer's guarantee), and operating at a minimum temperature of 1450 degrees F.

The drums on both UTECO Onyx presses are enclosed, with 98% of VOC expected to be captured and directed to the thermal oxidizer having an overall control efficiency of 98%. VOC shall be calculated using this 98% control efficiency, and include VOC from inks, adhesives and cleaning solvents and any emissions as a result of by-passing the thermal oxidizer. This Department may, at any time, request a stack test using acceptable test methods to demonstrate the capture and control efficiency of the presses and RTO.

The permittee shall maintain consumption records of all process-related materials containing volatile organic compounds (VOC) and hazardous air pollutants (HAP). These records shall include the total amount of each material used and the VOC content in percent by weight of each material. VOC emissions shall be calculated on a monthly basis, and a twelve month rolling sum (the sum of each consecutive 12-month period) shall be calculated for each month. Emissions from malfunctions are required to be quantified and included in the calculations.

If total VOC emissions exceed 45 tons during any twelve month period or the capture/control efficiency is questioned, a stack test may be requested by this Department to demonstrate actual emissions and the overall control efficiency.

The permittee shall record all bypasses of the RTO. The bypass cause, duration and corrective action taken shall be recorded and reported to NYSDEC Region 9. Such bypasses do not include initial start-up of control equipment or during the times when the presses were operating and applying inks and solvents that did not contain VOC.

Any proposed usage of inks or solvents which contain



hazardous air pollutants (HAPs) will require written notification to this Department including identification of the HAP(s), calculation of potential emissions, and air dispersion modeling in accordance with Air Guide-1 to demonstrate that emissions will not exceed short term (SGC) or annual guideline concentrations (AGC). A permit modification may be required if additional monitoring conditions or a change in current conditions is required.

Records of all verifications, investigations and corrective actions will be kept on-site or a period of five years and in a format that is readily accessible to Department representatives on request. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and the permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: VOC

Upper Permit Limit: 49.5 tons per year

Reference Test Method: Method 18 or Method 25 or Method 25A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 4: Air pollution prohibited**  
**Effective between the dates of 04/20/2015 and 04/19/2025**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 4.1:**

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

**Condition 5: Compliance Demonstration**



Effective between the dates of 04/20/2015 and 04/19/2025

Applicable Federal Requirement:6 NYCRR 234.6

**Item 5.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 5.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with 6NYCRR, Part 234.6, the permittee shall not use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access.

The permittee shall not use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive.

All cleaning-solvent, including solvent soaked materials, shall be kept in closed leak-free containers that are opened only when adding or removing material. Rags used for wipe cleaning shall be stored in closed containers when not in use. Each container shall be clearly labeled with its contents. Unless records show that VOC-containing cleaning material was sent offsite for legal disposal, it will be assumed that it evaporated on site.

If cleaning solvent escapes from a container, the permittee shall wipe up or otherwise remove immediately if in accessible areas. For areas where access is not feasible during normal production, remove as soon as reasonably possible.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 6: Compliance Demonstration**  
Effective between the dates of 04/20/2015 and 04/19/2025

Applicable Federal Requirement:6 NYCRR 234.7

**Item 6.1:**

The Compliance Demonstration activity will be performed for the Facility.

**New York State Department of Environmental Conservation**

Permit ID: 9-2926-00097/00003

Facility DEC ID: 9292600097



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

**Item 6.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

The owner or operator of a graphic art facility which is not subject to the control requirements of this Part because its annual potential to emit VOC or its total actual VOC emissions, whichever applies is below the applicability criteria, must maintain records in a format acceptable to the Department that verify the facility's annual potential to emit VOC or its total actual VOC emissions. Upon request, these records must be submitted to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 7: Compliance Demonstration**  
**Effective between the dates of 04/20/2015 and 04/19/2025**

**Applicable Federal Requirement:6 NYCRR 234.8**

**Item 7.1:**

The Compliance Demonstration activity will be performed for the Facility.



**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 04/20/2015 and 04/19/2025**

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

**Item 8.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee owns/operates a facility affected by 40 CFR 63.820 Subpart KK-National Emission Standards for the Printing and Publishing Industry. Since potential emissions of hazardous air pollutants (HAP) are currently less than the major source thresholds of 10 tons for any individual HAP and 25 tons for total HAP, the facility, as an area source, is subject only to the recordkeeping provisions of 63.829(d) and 63.830(b)(1).

The permittee shall keep records, such as Material Safety Data Sheets (MSDS) or Technical Data Sheets which identify the percentage composition and type of all hazardous air pollutants (HAP) contained in the adhesive(s) formulation. The permittee will notify this Department prior to making any changes in formulation which would result in potential facility wide HAP emissions exceeding 10/25 tons for any individual and total HAP respectively.



An increase in potential emissions beyond the 10/25 major source threshold will require either a federally enforceable emissions cap or compliance with Subpart KK.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 9: Compliance Demonstration**  
Effective between the dates of 04/20/2015 and 04/19/2025

**Applicable Federal Requirement:40CFR 63.830(b)(1), Subpart KK**

**Item 9.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to this subpart shall submit the reports specified below to the Administrator:

(1) An initial notification required in Sec. 63.9(b).

(i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in Sec. 63.826(a).

(ii) Initial notifications for new and reconstructed sources shall be submitted as required by Sec. 63.9(b).

(iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under Sec. 63.9(b), provided the same information is contained in the permit application as required by Sec. 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(iv) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

**Condition 10: Emission Unit Permissible Emissions**  
Effective between the dates of 04/20/2015 and 04/19/2025

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

**Item 10.1:**

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 0-00001

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 11.3 pounds per hour

99,000 pounds per year

**Condition 11: Compliance Demonstration**  
Effective between the dates of 04/20/2015 and 04/19/2025

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

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: 002

Regulated Contaminant(s):

CAS No: 000101-68-8 METHYLENE BISPHENYL ISOCYANATE

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The two-part Purelam polyurethane adhesive used for the laminator and applied by a metered roller, contains several isocyanate monomers which have been assigned an "A" environmental rating. Based on the current usage and mix ratio of pre-polymer and catalyst (approximately 70,000 pounds) and the isocyanate concentration (55%) given on the Material Safety Data sheet, the emission rate potential (less than 1 pound per hour) of isocyanate was modeled using AERSCREEN and Air Guide-1 guidance and the



impacts found to be less than both the AGC (annual) and SGC (hourly) concentration.

The modeled impacts predicted an annual impact of 0.18810 ug/m<sup>3</sup> compared to the AGC of 0.6 ug/m<sup>3</sup> and an hourly impact of 1.881 ug/m<sup>3</sup> compared to the SGC of 14 ug/m<sup>3</sup>.

The permittee shall, in its annual capping statement submitted to this Department, include the amount and type of adhesive used for the previous calendar year. An increase in adhesive usage containing isocyanates which are both hazardous air pollutants (HAP) and volatile organic compounds (VOC), or an increase in the isocyanate concentration will require the isocyanate impacts be re-evaluated.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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



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

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

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 12: Contaminant List**  
**Effective between the dates of 04/20/2015 and 04/19/2025**



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

**Item 12.1:**

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

CAS No: 000101-68-8

Name: METHYLENE BISPHENYL ISOCYANATE

CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

**Condition 13: Malfunctions and start-up/shutdown activities  
Effective between the dates of 04/20/2015 and 04/19/2025**

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

**Item 13.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

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

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

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



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

**Condition 14: Emission Unit Definition**  
**Effective between the dates of 04/20/2015 and 04/19/2025**

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

**Item 14.1:**

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

Emission Unit: 0-00001

Emission Unit Description:

This emission unit describes flexographic printing of packaging materials using two presses; an 8 color UTECO Onyx 808 and a 10 color UTECO Onyx 107 press. Emissions from both UTECO presses are directed to an Anguil regenerative thermal oxidizer(RTO) emission point 00001. This emissions unit also includes 10 hot knife cutting machines (emission point 00002) and a solventless laminator (emission points 00003 & 0004).

Building(s): 1

**Condition 15: Renewal deadlines for state facility permits**  
**Effective between the dates of 04/20/2015 and 04/19/2025**

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

**Item 15.1:**

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

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 04/20/2015 and 04/19/2025**

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

**Item 16.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall





Emission Point: 00004  
Height (ft.): 20 Diameter (in.): 6  
NYTMN (km.): 4786.7 NYTME (km.): 195.1 Building: 1

Emission Point: 00005  
Height (ft.): 29 Diameter (in.): 19  
NYTMN (km.): 4786.7 NYTME (km.): 195.245 Building: 1

Emission Point: 00006  
Height (ft.): 29 Diameter (in.): 19  
NYTMN (km.): 4786.7 NYTME (km.): 195.245 Building: 1

Emission Point: 00007  
Height (ft.): 25 Diameter (in.): 16  
NYTMN (km.): 4786.7 NYTME (km.): 195.245 Building: 1

**Condition 19: Process Definition By Emission Unit**  
**Effective between the dates of 04/20/2015 and 04/19/2025**

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

**Item 19.1:**

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

Emission Unit: 0-00001  
Process: 001 Source Classification Code: 4-05-003-01

Process Description:

Flexographic printing on plastic/poly using a UTECO Onyx 8 color press installed in March of 2010 and a UTECO Onyx 107 ten color press installed in May of 2013. Volatile organic compound emissions from inks used on these presses are controlled by a regenerative thermal oxidizer (RTO). There are two by-pass stacks identified as emission points 00005 and 00006.

A solvent recovery still is used to recover waste solvents and inks.

Emission Source/Control: 00001 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: 00004 - Process

Emission Source/Control: 0002A - Process

**Item 19.2:**

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

Emission Unit: 0-00001  
Process: 002 Source Classification Code: 4-02-007-01

Process Description:

Laminator using a solventless adhesives to produce food

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packaging that requires the lamination of different polymer film layers including but not limited to polyethylene, polypropylene, and polyester. A rubber roller applies a metered amount of the adhesive to the film. There are two emission points associated with the laminator: EP 00003 (front-end) and EP 00004 (back-end).

Emission Source/Control: 00005 - Process

**Item 19.3:**

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

Emission Unit: 0-00001

Process: 003

Process Description:

Ten hot knife cutting machines used to seal and separate polyethylene and polypropylene bags. The machines are vented to a common duct and emission point EP 00002.

Emission Source/Control: 00006 - Process

