

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 1-4728-01386/00013

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Facility Identification Data

Name: CEDAR GRAPHICS IGI
Address: 1700 OCEAN AVENUE
City: RONKONKOMA
Zip: 11779

Owner/Firm

Name: CEDAR GRAPHICS INC.
City: RONKONKOMA
State: NY Country: USA Zip: 11779
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: ROGER EVANS

Division of Air Resources:
Name: ANNA Y GUAN

Air Permitting Facility Owner Contact:
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Address: CEDAR GRAPHICS CORP
1700 OCEAN AVENUE

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

THIS DOCUMENT PRESENTS THE APPLICATION FOR A TITLE V AIR PERMIT FOR AN OFFSET LITHIOGRAPHIC PRINTING FACILITY.

Attainment Status

CEDAR GRAPHICS IGI is located in the town of ISLIP in the county of SUFFOLK. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

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Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

COMMERCIAL PRINTER UTILIZING BOTH CONVENTIONAL (WITH FOUNTAIN SOLUTION) AND WATERLESS, OFFSET LITHIOGRAPHIC PRINTING PRESSES. OPERATIONS INCLUDE (EXEMPT) ULTRAVIOLET CURING FOR IMPARTING A GLOSSY FINISH ON TO PAPER, A (TRIVIAL) PREPERATION ROOM WITH PHOTO GRAPHIC PROCESSING AND PROOFING EQUIPMENT, AN (EXEMPT) WASTE LIQUID TANK, AND A WATER EVAPORATOR. IN ADDITION TO THE "ORIGINAL" BUILDING THAT CONTAINS THE PRESSES, OFFICES AND OVERALL OPERATIONS OF THE CEDAR FACILITY, THERE IS A "WAREHOUSE" THAT CONTAINS THE UV COATER, STORAGE, AND SPACE LEASED TO A MANUFACTURING OPERATIONS USING THE DIE CUTTING EQUIPMENT. THIS IS UNRELATED TO CEDAR'S OPERATIONS AND CONTAINS NO CHEMICAL EMISSIONS REQUIRING PERMITTING. ALSO IN THE BUILDING CHARED BY CEDAR GRAPHICS IS CEDAR DIGITAL, AN INDEPEN

Permit Structure and Description of Operations

The Title V permit for CEDAR GRAPHICS IGI is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the

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outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

CEDAR GRAPHICS IGI is defined by the following emission unit(s):

Emission unit U00002 - PRESS ROOM- THE PRESS ROOM IN THE "ORIGINAL" BUILDING CONTAINS THREE CONVENTIONAL (WITH FOUNTAIN SOLUTIONS) AND/OR "WATERLESS" 6 COLOR OFFSET PRINTERS WITH COATERS; TWO 6-COLOR CONVENTIONAL OFFSET PRINTERS WITH NO COATERS; AND ONE HEIDELBERGER DI DIGITAL DIRECT TO PLATE PRESS 4-COLOR OFFSET PRINTER. THE PRESS ROOM ALSO CONTAINS THE INK STORAGE AREA; ALLINKS ARE IN 5 GALLON OR 5 POUND SEALED CANS OR OTHERWISE SEALED.

Emission unit U00002 is associated with the following emission points (EP):

00004, 00006, 00007, 00009, 00011, 00012, 00015, 00016, 00K21, 00M17, 00M18, 00M19, 00M20

It is further defined by the following process(es):

Process: P02 is located at Building ORIGINAL - SIX PRESSES THAT HAVE PERMITTED EMISSION POINTS EACH HAS A VENT COMING FROM A TOWER COATER AT THE DELIVERY END OF THE PRESS AND A VENT AT THE ELECTRIC DRYER COMPARTMENT. TWO OF THE PRESSES EACH HAS A SINGLE EMISSIONS VENTS.

Emission unit U00001 - THIS UNIT CONTAINS A GAS FIRED SAMSCO WATER EVAPORATOR OF 175 GALLON CAPACITY WITH A 55 GALLON STORAGE TANK.

Emission unit U00001 is associated with the following emission points (EP):

00023

It is further defined by the following process(es):

Process: P01 is located at Building ORIGINAL - WASTE WATER FROM FILM PROCESSING OPERATIONS OR PRESS CLEANING OPERATIONS IS EVAPORATED BY A GAS FIRED HEATING UNIT. THE MAXIMUM ALLOWED PROCESS RATE IS 5 GALLONS OF INFLUENT PER HOUR. CEDAR GRAPHICS OPERATES THE EVAPORATOR FROM 08:00PM TO 08:00AM TO AVOID

Title V/Major Source Status

CEDAR GRAPHICS IGI is subject to Title V requirements. This determination is based on the following information:

This facility is subject to Title V requirements. Facility is major source for VOC emissions. The potential to emit VOC is between 25and 40 tons per year.

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Program Applicability

The following chart summarizes the applicability of CEDAR GRAPHICS IGI with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and

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contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2752	COMMERCIAL PRINTING LITHOGRAPH

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SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
4-05-002-12	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL
4-02-825-01	PRINTING - LETTER PRESS SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - WASTEWATER, POINTS OF GENERATION PRINTING BLANKET, ROTARY SCREEN

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000107-21-1	1, 2-ETHANEDIOL (HAP)	34	
000098-82-8	BENZENE, (1-METHYLETHYL) (HAP)	418	
000630-08-0	CARBON MONOXIDE	180	
000075-09-2	DICHLOROMETHANE (HAP)		> 0 but < 10 tpy
000111-76-2	ETHANOL, 2-BUTOXY-(HAP)		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 10 tpy but < 25 tpy
000091-20-3	NAPHTHALENE (HAP)	6	

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ONY210-00-0	OXIDES OF NITROGEN	857	
ONY075-00-0	PARTICULATES	483	
007446-09-5	SULFUR DIOXIDE	5	
ONY998-00-0	VOC	>= 25	tpy but < 40 tpy
001330-20-7	XYLENE, M, O & P MIXT.(HAP)	1274	

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	40CFR 82-F.	Protection of Stratospheric Ozone - recycling and emissions reduction	37
FACILITY	6NYCRR 200.5	Sealing.	1
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	2
FACILITY	6NYCRR 200.7	Maintenance of equipment.	3
FACILITY	6NYCRR 201-1.10(b)	Permitting - public access to records kept for Title V permitting	9
FACILITY	6NYCRR 201-1.2	Permitting - unpermitted emission sources	4
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	5
FACILITY	6NYCRR 201-1.5	Emergency defense	6
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	7
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	8
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	10
FACILITY	6NYCRR 201-3.2(c)	Exempt Activities - exempt activity list	11
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	12
FACILITY	6NYCRR 201-5.	State Facility Permit General Provisions	53
FACILITY	6NYCRR 201-5.3(b)	Permit Content and Terms of Issuance - permit conditions	55, 54
FACILITY	6NYCRR 201-6.	Title V Permits and the Associated Permit Conditions	13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 38, 39
FACILITY	6NYCRR 201-6.5(c)(3)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	27
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	26
FACILITY	6NYCRR 201-6.5(g)	Permit shield	28, 29
FACILITY	6NYCRR 202-1.1	Required emissions tests.	30
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	31
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	32
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution	56

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FACILITY	6NYCRR 211.3	prohibited. General Prohibitions - visible emissions limited	33
U-00002	6NYCRR 212.7(p)	Exemptions	40
FACILITY	6NYCRR 215.	Open Fires	34
U-00002	6NYCRR 234.1(g)	"Once in always in"	41
U-00002/-/P02	6NYCRR 234.3(a)(3)(iv)	control requirements	48
U-00002	6NYCRR 234.3(b)(1)	control requirements - offset lithographic printing	42
U-00002	6NYCRR 234.3(b)(2)	control requirements - offset lithographic printing	43
U-00002	6NYCRR 234.3(e)	Graphic Arts - control requirements - opacity	44, 45
U-00002	6NYCRR 234.3(f)(1)	RACT variance	46
U-00002	6NYCRR 234.4(a)	Testing, monitoring, and recordkeeping	47
FACILITY	6NYCRR 234.4(b)(3)	Testing, Monitoring and Recordkeeping - purchase, usage and/or production records for inks, VOC and solvents	35
U-00002/-/P02	6NYCRR 234.4(b)(4)	testing, monitoring and recordkeeping	49
U-00002/-/P02	6NYCRR 234.4(b)(5)	testing, monitoring and recordkeeping	50
U-00002/-/P02	6NYCRR 234.5(a)	prohibition of sale or specification	51
U-00002/-/P02	6NYCRR 234.5(b)	prohibition of sale or specification	52
FACILITY	6NYCRR 234.6	Handling, storage and disposal of volatile organic compounds (VOC).	36

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

6NYCRR Part 200-.5

Allows for the sealing of non-compliant air contamination sources

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.2

Any existing emission source that is required to be permitted or registered but has

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not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.5

An enforcement action may be avoided if the facility can demonstrate that an emergency situation occurred which resulted in an emission limitation or permit violation. The following information would constitute evidence of an emergency situation: a properly signed operating log recorded during the actual event which; identifies the cause(s) of the emergency, indicates that all equipment was operating properly at the time, the person responsible took all reasonable steps to minimize the exceedance or violation, and that the department was notified of the emergency within 2 working days of the event.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-1.10(b)

Any permit application, compliance plan, permit, and monitoring and compliance certification report that is submitted as part of the Title V permit process must be made available to the public as per requirements set forth under 6 NYCRR Part 616 - Public Access to Records and section 114(c) of the Clean Air Act Amendments of 1990.

6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6NYCRR Part 201-3.3(a)

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The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-5

This regulation applies to those permit terms and conditions which are not federally enforceable. It specifies the applicability criteria for state facility permits, the information to be included in all state facility permit applications as well as the permit content, terms of permit issuance, and sets guidelines for modifying state facility permits and allowing for operational flexibility. For permitting purposes, this rule specifies the need to list all emission units except those that are exempt or trivial pursuant to Subpart 201-3 in the permit application and provide a description of the emission unit's processes and products. Finally, this rule also provides the Department the authority to include this and any other information that it deems necessary to identify applicable Federal standards, recordkeeping and reporting requirements, and establish terms and conditions that will ensure compliance with the national ambient air quality standards.

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR Part 201-6.5(c)(3)

This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

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6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of

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appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, CEDAR GRAPHICS IGI has been determined to be subject to the following regulations:

6NYCRR 201-3.2 (c)

This section lists the specific activities which may be exempt from the permitting provisions of this Part.

6NYCRR 212 .7 (p)

This regulation exempt VOC emissions from graphic arts processes subject to 6 NYCRR Part 234 that are not rated 'A', from provisions of 6 NYCRR Part 212.

6NYCRR 234 .1 (g)

Once a printing process at a facility is subject to the requirements of Part 234, it always will be subject to the rule even if the emissions of volatile organic compounds from the facility are less than the applicability limits.

6NYCRR 234 .3 (a) (3) (iv)

The overall removal efficiency is determined by (1) testing the capture efficiency of the removal system; and (2) testing the destruction efficiency. The testing methods used to determine the overall removal efficiency must be approved in advance by the DEC.

6NYCRR 234 .3 (b) (1)

The facility began operation prior to September 1, 1988. An offset lithographic printing process is used at the facility which is subject to Part 234, and which uses fountain solutions containing volatile organic compounds containing 15% by weight or less of volatile organic compounds.

In addition, an air cleaning device must be used in which 90% of the volatile organic compounds are removed from the exhaust stream.

6NYCRR 234 .3 (b) (2)

The facility began operation on or after September 1, 1988. An offset lithographic printing process is used at the facility which is subject to Part 234, and which uses fountain solutions containing volatile organic compounds containing 10% by weight or less of volatile organic compounds.

In addition, an air cleaning device must be used in which 90% of the volatile organic compounds are removed from the exhaust stream.

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6NYCRR 234 .3 (e)

The emissions to the outdoor atmosphere may not exceed an average opacity greater than 10% for any consecutive six-minute period from any emission source subject to Part 234.

6NYCRR 234 .3 (f) (1)

Printing processes may be operated with a lesser degree of control than is required per Part 234 provided that a reasonably available control technology (RACT) proposal acceptable to the DEC is submitted by the facility. Such a proposal must be submitted in a permit application, and would be subject to public review and comment. In addition, the proposal would be submitted to the United States Environmental Protection Agency as a revision to the New York State Implementation Plan.

6NYCRR 234 .4 (a)

This regulation specifies methods for demonstrating overall VOC removal efficiency.

6NYCRR 234 .4 (b) (3)

The facility is required to maintain records of purchases and usage of inks, volatile organic compounds, and solvents. The facility maintains these records in a log book for a minimum of five years.

6NYCRR 234 .4 (b) (4)

The facility must supply the DEC with the results of any analysis or procedure used for establishing compliance with the requirements of Part 234. These results must be submitted semi-annually at a minimum. In addition, representatives of the DEC may obtain samples of inks or fountain solutions during normal business hours in order to determine whether the facility is in compliance with the requirements of Part 234.

6NYCRR 234 .4 (b) (5)

Any graphic arts facility which is not subject to the control requirements of Part 234 because its annual potential to emit volatile organic compounds are below the applicability criteria, must maintain records in a format acceptable to the commissioner's representative that verify the facility's annual potential to emit VOC. Upon request, these records must be submitted to the department.

6NYCRR 234 .5 (a)

It is prohibited to sell, specify, or require for use a non-compliant ink or coating unless a process-specific variance from the requirements of Part 234 has been granted by the DEC or where control equipment is used to comply with the requirements of Part 234.

6NYCRR 234 .5 (b)

Any person selling a coating or ink for use at a printing process subject to 6NYCRR Part 234 must, upon request, provide the user with certification of the volatile organic compound content of the coating or ink supplied.

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Permit Review Report

Permit ID: 1-4728-01386/00013

7/22/02 09:43:19



6NYCRR 234 .6

This requirement pertains to general provisions for the handling, storage and disposal of volatile organic compounds and applies to open containers except where production, sampling, maintenance or inspection procedures require operation access; and to actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

Compliance Certification

Summary of monitoring activities at CEDAR GRAPHICS IGI:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	54
FACILITY	record keeping/maintenance procedures	27
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	31
U-00002	work practice involving specific operations	42
U-00002	work practice involving specific operations	43
U-00002	monitoring of process or control device parameters as surrogate	44
U-00002	monitoring of process or control device parameters as surrogate	45
U-00002	record keeping/maintenance procedures	46
FACILITY	record keeping/maintenance procedures	35
FACILITY	record keeping/maintenance procedures	36

Basis for Monitoring

6 NYCRR Part 234.3 (b) limits VOC content of fountain solutions for offset lithographic printing presses subject to Part 234, to 15% by weight for presses in operation prior to 9/1/1988 and 10% by weight for presses started operation after 9/1/1988.

6 NYCRR 234.3 (e) Limits emission opacity to 10% (Method 9-six minute average) for facilities subject to Part 234.