New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 1-4728-04190/00004
04/19/2010

Facility Identification Data
Name: BEMIS COMPANY INC
Address: 100 WILSHIRE BLVD
EDGEWOOD, NY 11717

Owner/Firm
Name: BEMIS COMPANY INC
Address: ONE NEENAH CENTER
PO BOX 669
NEENAH, WI 54957, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: MARILYN E PETERSON
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50 CIRCLE RD
STONY BROOK, NY 11790-3409
Phone:6314440365

Division of Air Resources:
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Air Permitting Contact:
Name: PIOTR SOWA
Address: ALCAN PACKAGING FOOD AND TOBACCO INC
100 WILSHIRE BLVD
BRENTWOOD, NY 11717
Phone:6317942911

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 a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
Alcan Packaging operates a facility in Edgewood, Town of Islip, for the manufacturing of labels for consumer an industrial products. The Edgewood facility contains provisions for four central-impression (CI) flexographic printing lines, two ink jet printing units, two seaming/forming machines, and a

flexographic plate-making process (all identified under the grouping of Emission Unit 1-Print). The flexographic printing lines have up to ten-color CI capability, downstream (in-line) coater/laminator capability, and back-side printing capability.

Hot air dryers on the flexographic presses will be used between the application of different colors and coatings. Solvent-based materials will be utilized at the CI and back print deck location, at ink jet unit locations, and at the seaming/forming machines; while, water-based materials will be utilized at downstream coater/laminator deck locations. Volatile Organic Compound (VOC) emissions generated from solvent based operations are captured and controlled through the use of Permanent Total Enclosure technology (meeting criteria for 100% VOC capture efficiency) and the use of two (2) regenerative thermal oxidizers (RTOs). The oxidizers will be operated to perform with minimum VOC destruction efficiencies of 98%. A catalytic oxidizer operates as a backup to be used if one of the RTOs is out of service.

VOC bearing waste (e.g., rags containing VOC solvent from press clean-up operations) will be collected and properly managed in accordance with 6 NYCRR part 234.6.

Applicable Federally enforceable annual emission limits are 60 tons per year (tpy) of VOC, 22.5 tpy of nitrogen oxides (NOx), 22.5 tpy of hazardous air pollutants (HAPs), and 9 tpy of any individual HAP. These limits were established to meet major nonattainment area new source review requirements, and to establish area source status for HAP emissions.

Monthly and rolling 12-month net VOC throughput and fuel consumption records and emissions calculations will be maintained by Alcan packaging to show compliance with the emission limits.

Permit-exempt activities that are currently installed at the Edgewood facility include graphics equipment to be operated by Fine Line Graphics, or another graphics equipment vendor, and a non-vapor phase parts washer that will use only organic solvents with an initial boiling point greater than or equal to 300 F at atmospheric pressure, and a vapor pressure less than or equal to 1.0 mm Hg at 20 C. VOC emissions form these exempt sources will be ducted to the thermal oxidizers for control. Additional exempt activities that are currently installed include numerous small natural gas fired heating, ventilating, and air conditioning (HVAC) units and other small (less than 10 MMBTU/hr) natural gas fired units.

Attainment Status
BEMIS COMPANY INC 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.)

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:
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Permit Structure and Description of Operations
The Title V permit for BEMIS COMPANY INC
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 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.

BEMIS COMPANY INC is defined by the following emission unit(s):

Emission unit 07USTS - This Emission Unit consists of the following seven (7) underground storage tanks. Six tanks are used to store solvents. The seventh tank is used for spill containment.

Tank #1 - 6,000 gallons Blend 80/20
Tank #2 - 6,000 gallons Blend 80/20
Tank(s) #3, #4, & #5 - 6,000 gallons total (3 2,000 gallons compartments)
Tank #3 - 2,000 gallons Alcan Blend AL-SS
Tank #4 - 2,000 gallons Blend 80/20
Tank #5 - 2,000 gallons Alcan Blend AL-SS
Tank #6 - 6,000 gallons Alcan Blend AL-SS
Tank #7 - 6,000 gallons spill containment

Emission unit 07USTS is associated with the following emission points (EP):
000T1, 000T2, 000T3, 000T4, 000T5, 000T6, 000T7
Process: TNK is located at Building UST Area - Loading and storage of solvents in six (6) underground storage tanks and spill containment liquid in one (1) underground storage tank.

Emission unit 1PRINT - Multiple central-impression (CI) flexographic printing lines, two ink jet printing units, two seaming/forming machines, and a flexographic plate-making process. The flexographic printing lines have up to ten-color CI capability, downstream (in-line) coater/laminator capability, and back-side printing capability.

Volatile Organic Compound (VOC) emissions generated from solvent based operations are captured and controlled through the use of Permanent Total Enclosure technology (meeting criteria for 100% VOC capture efficiency) and the use of two (2) regenerative thermal oxidizers (RTOs). A catalytic oxidizer operates as a backup to be used if one of the RTO units is out of service.

Emission unit 1PRINT is associated with the following emission points (EP):
00001, 00002, 00003, 00004, 00005, 00006
Process: 128 is located at Building PLANT - Operation of multiple CI flexographic printing lines, two ink jet printing units, flexographic plate-making process, and seaming/forming machines; all emissions will be captured in a permanent total enclosure and sent to the oxidizers for control.
Process: 129 is located at Building PLANT - Flexographic plate-making process employing low-emitting organic wash/cleaning materials. VOC emissions from this process will be captured and sent to the oxidizers for control. This process covers flexographic plate making operations.

Process: 131 is located at Building PLANT - Non-vapor phase parts washer that uses only organic solvents less than 1.00 mm Hg at 20 degrees C. The powered exhaust from the washer and fugitive VOC emissions from the parts washer room are ducted to the oxidizers for control. This process covers the

parts washing operation.

Title V/Major Source Status
BEMIS COMPANY INC is subject to Title V requirements. This determination is based on the following information:
The facility is permitted to emit Volatile Organic Compounds in excess of 25 tons per year; which makes it a major source.

Program Applicability
The following chart summarizes the applicability of BEMIS COMPANY INC with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
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 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
2671	PAPER COATED AND LAMINATED PACKAGING
2759	COMMERCIAL PRINTING, NEC

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
4-01-002-96	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DEGREASING OTHER NOT CLASSIFIED - GENERAL DEGREASING UNITS
4-05-003-01	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL PRINTING - FLEXOGRAPHIC
4-05-005-97	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL OTHER NOT CLASSIFIED
4-05-007-01	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Solvent Storage: General

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service 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
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
0NY100-00-0	HAP	45000	
007439-92-1	LEAD		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	45000	
0NY075-00-0	PARTICULATES		>= 2.5 tpy but < 10 tpy
0NY075-00-5	PM-10		>= 2.5 tpy but < 10 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy
0NY998-00-0	VOC	120000	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance

with emissions limitations or permit conditions for all facilities in New York State.

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

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

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.
(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.5(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

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

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

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)
This Title V permit shall be reopened and revised under any of the following circumstances:

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

Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

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

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

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

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.
Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

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

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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all

criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	55	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63-KK.820(a)(7)	34, 35	Printing and Publishing NESHAP-applicability
FACILITY	40CFR 63-KK.830(b)(1)	36	Printing and Publishing NESHAP-Reporting requirements
1-PRINT	40CFR 64	51, 52, 53, 54	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	56	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 37, 38	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	14	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2	General conditions Fees
FACILITY	6NYCRR 201-6.5(a)(8)	15	General conditions
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for

			Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	16	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	23	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7	24, 25	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	6	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	7	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	57	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	19	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 212.4(a)	26, 27	General Process Emission Sources - emissions from new sources and/or modifications
1-PRINT	6NYCRR 212.4(a)	40	General Process Emission Sources - emissions from new sources and/or modifications
FACILITY	6NYCRR 215	8	Open Fires
0-7USTS	6NYCRR 229.3(e)(2)(v)	39	Volatile organic liquid storage tanks
FACILITY	6NYCRR 231-2	25	New Source Review in Nonattainment Areas and Ozone Transport Region
1-PRINT	6NYCRR 231-2.2	41	Applicability
FACILITY	6NYCRR 231-2.4	28	Permit Requirements
1-PRINT	6NYCRR 231-2.5	42	Lowest achievable emission rate, LAER
FACILITY	6NYCRR 234.1(g)	29	"Once in always in"
FACILITY	6NYCRR 234.3(a)(3)(iii)	30, 31	control requirements - flexographic printing
1-PRINT	6NYCRR 234.3(a)(3)(iii)	43, 44	control requirements - flexographic printing
1-PRINT	6NYCRR 234.3(e)	45	Graphic Arts - control requirements - opacity
1-PRINT	6NYCRR 234.4(b)(1)	46	testing, monitoring and recordkeeping
1-PRINT	6NYCRR 234.4(b)(2)	47	testing, monitoring and recordkeeping

1-PRINT	6NYCRR 234.4(b)(3)	48	Testing, Monitoring and Recordkeeping - purchase, usage and/or production records for inks, VOC and solvents
1-PRINT	6NYCRR 234.4(b)(4)	49	testing, monitoring and recordkeeping
1-PRINT	6NYCRR 234.4(c)	50	Exhaust gas temperature
FACILITY	6NYCRR 234.5(a)	32	prohibition of sale or specification
FACILITY	6NYCRR 234.6	33	Handling, storage and disposal of volatile organic compounds (VOC).

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

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 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

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 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.

6 NYCRR 201-3.3 (a)
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.

6 NYCRR Subpart 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.

6 NYCRR 201-6.5 (a) (4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.5 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.5 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.5 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.5 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.5 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding 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.

6 NYCRR 201-6.5 (d) (5)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 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.

6 NYCRR 201-6.5 (f) (6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 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.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 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.

6 NYCRR 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 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
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.

40 CFR Part 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

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 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, BEMIS COMPANY INC has been determined to be subject to the following regulations:
40 CFR 63.820 (a) (7)
This regulation allows the facility to establish itself as an area source status by limiting its potential to emit through.

40 CFR 63.830 (b) (1)
This regulation requires that each owner or operator of an affected source subject to this subpart shall submit the reports specified below to the Administrator:
An initial notification required in § 63.9(b).

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

(ii) Initial notifications for new and reconstructed sources shall be submitted as required by § 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 § 63.9(b), provided the same information is contained in the permit application as required by § 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 notification.

40 CFR Part 64
The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6 NYCRR 212.4 (a)
This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after

July 1, 1973) process emission sources.

6 NYCRR 229.3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6 NYCRR 231-2.2
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The purpose of Section 231-2.2 is to define what new or modified facilities are subject to the requirements set forth in the other sections of the rule. In addition, certain exemptions to the rule are also defined in this section.

6 NYCRR 231-2.4
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The permitting requirements for proposed source projects and new major facilities are set forth in section 231-2.4.

6 NYCRR 231-2.5
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

Emission controls equivalent to the lowest achievable emission rate (LAER) must be implemented for each contaminant for which Subpart 231-2 is applicable for a given source project or new major facility. LAER is defined as the most stringent emission limitation achieved in practice or which can be expected to be achieved in practice for a category of emission sources taking into consideration each air contaminant which must be controlled (6 NYCRR 200.1(ak)).

6 NYCRR 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.

6 NYCRR 234.3 (a) (3) (iii)
The capture system and air cleaning device must be designed and operated such that the following minimum overall removal efficiencies of volatile organic compounds is achieved:

- flexographic printing processes - 60%

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.

6 NYCRR 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.

6 NYCRR 234.4 (b) (1)
The United States Environmental Protection Agency has approved several test methods for determining the concentration of a particular contaminant in flue gas. These methods can be found at 40 CFR 60, Appendix A. The facility will use Method ____ to determine the concentration of volatile organic compounds in the flue gas.

6 NYCRR 234.4 (b) (2)
The United States Environmental Protection Agency has approved test methods for determining the concentration of volatile organic compounds, water content, and solids content of inks and coatings (see 40 CFR 60, Appendix A). The facility must use either Methods 24 or 24A or or obtain the composition of the ink solvent/volatiles from the manufacturer.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 234.4 (c)
Where the affected source has control equipment, then specific continuous monitors (as specified or otherwise required by the Commissioner) must be installed, calibrated, and operated at all times.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR Subpart 201-7
This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6 NYCRR Subpart 231-2
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

Compliance Certification
Summary of monitoring activities at BEMIS COMPANY INC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	34	record keeping/maintenance procedures
FACILITY	35	monitoring of process or control device parameters as surrogate
FACILITY	36	record keeping/maintenance procedures
1-PRINT	51	record keeping/maintenance procedures
1-PRINT	52	record keeping/maintenance procedures
1-PRINT	53	record keeping/maintenance procedures
1-PRINT	54	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	6	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	27	intermittent emission testing
1-PRINT	40	monitoring of process or control device parameters as surrogate
0-7USTS	39	record keeping/maintenance procedures
1-PRINT	41	monitoring of process or control device parameters as surrogate
1-PRINT	42	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	monitoring of process or control device parameters as surrogate
1-PRINT	44	record keeping/maintenance procedures
1-PRINT	45	monitoring of process or control device parameters as surrogate
1-PRINT	48	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures

Basis for Monitoring
6 NYCRR Part 201-7 requires monitoring of NOx in order to avoid Part 231-2 review of increased NOx emissions.

6 NYCRR Part 212.4(a) requires stack testing to demonstrate compliance with BACT and LAER requirements.

6 NYCRR Part 234.3(a)(iii) requires that oxidizer temperatures be maintained in order to ensure adequate VOC destruction.

49 CFR 63-KK.63.820(a)(7) requires HAP emissions be monitored to ensure that the facility remains an area source of HAP emissions.

6 NYCRR Part 231-2.2 requires that VOC emissions be monitored to maintain compliance with the Part 231-2 VOC emission limit.