

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6105-00149/00006 Renewal Number: 1



03/06/2006

Facility Identification Data

Name: ULTRA FLEX PKG CORP-975 ESSEX ST
Address: 975 ESSEX STREET
BROOKLYN, NY 11208-5419

Owner/Firm

Name: ULTRA FLEX PACKAGING CORP
Address: 975 ESSEX ST
BROOKLYN, NY 11208-5419, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: ELIZABETH A CLARKE
Address: ONE HUNTERS POINT PLAZA
47-40 21ST ST
LONG ISLAND CITY, NY 11101-5407
Phone:7184824997

Division of Air Resources:
Name: DIANA MENASHA
Address: NYSDEC REGION 2 OFFICE
HUNTERS POINT PLAZA
LONG ISLAND CITY, NY 11101
Phone:7184827263

Air Permitting Contact:
Name: RONALD BENNETT
Address: ULTRA FLEX PACKAGING CORPORATION
975 ESSEX ST
BROOKLYN, NY 11208-5419
Phone:7182729100

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.

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Summary Description of Proposed Project

This is a Title V air permit renewal application for Ultra Flex Packaging Corp. Currently, the facility has a Title V permit that was issued on 12/5/2000 and is due to expire on 12/4/2005. The facility operates three 10-color flexographic printing presses and one laminator ducted to the Regenerative Thermal Oxidizer (RTO) to produce flexible packaging materials. The facility creates VOC emissions that are currently processed through a natural gas fired regenerative thermal oxidizer with a destruction efficiency of 95% before emitting to the environment. This facility is a minor source and not a major source of HAPs. However, this facility is a major source of VOC.

Ultra Flex Packaging Corporation has been under an internal pollution prevention and equipment upgrade program for the past few years to reduce overall solvent use and contaminant emissions. Other such measures have included the first Fischer & Krecke state-of-the-art printing press (Emission Source FLX05) and the new regenerative thermal oxidizer (RTO) control technology to improve the VOC destruction efficiency and accommodate subsequent new printing presses. Two new 10-color (each) state-of-the-art Fischer & Krecke flexographic printing presses (Emission Sources FLX06 & FLX07) replaced four MAF 140 flexographic printing presses (Emission Sources FLXP1, FLXP2, FLXP3 & FLXP4) in 2003, of which two were 6-color and the other two were 8-color.

This Title V renewal consists of the Title V permit that was issued on 12/5/2000, and incorporating the following two Air State Facility Permits that were issued to Ultra Flex Packaging Corporation:

(1) ASF, DEC ID # 2-6105-00149/00011 issued on 7/15/2002 to replace an old catalytic oxidizer (Thermo Electron 21000) with a new Regenerative Thermal Oxidizer (RTO). The regenerative thermal oxidizer (RTO) is more efficient than the old previous catalytic oxidizer. The destruction efficiency of the RTO is about 95%. At the same time the facility began operation of a new Fischer & Krecke flexographic printing press (FLXP5) that was incorporated into the first Title V permit, but not operated until 4/1/2002, and

(2) ASF, DEC ID # 2-6105-00149/00012 issued on 5/14/2003 to construct two (2) new state-of-the-art Fischer & Krecke flexographic printing presses (FLXP6 & FLXP7), which are 10-color each, and to remove four (4) MAF 140 flexographic printing presses (two are 6-color and the other two are 8-color).

This facility has eliminated four (4) MAF 140 flexographic printing presses (FLXP1, FLXP2, FLXP3 & FLXP4), of which two were 6-color and the other two were 8-color printing presses, and replaced them with two (2) new state-of-the-art Fischer & Krecke flexographic printing presses (FLXP6 & FLXP7), which are 10-color each and are identical to the first printing press (FLXP5). The following four (4) flexographic printing presses (all vented to the oxidizer) were permanently removed from the facility in a phased approach:

FLXP1 MAF 140, 6-color press (originally installed in 1989; was removed on 2/28/03 with second Fischer & Krecke installation - FLXP6 (10-color printing press),

FLXP2 MAF140, 6-color press (originally installed in 1989; was removed on 2/28/03 with second Fischer & Krecke installation - FLXP6 (10-color printing press),

FLXP3 MAF140, 8-color press (originally installed in 1992; was removed on 2/28/2003 as well.

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FLXP4 MAF140, 8-color press (originally installed in 1994; was removed on 2/28/03 with second Fischer & Krecke installation FLXP6 (10-color printing press)).

FLXP5 is a 10-color existing permitted (first) Fischer & Krecke flexographic printing press, was installed on 4/1/2002. This FLXP5 printing press is designated as PRESS # 1 at the Ultra Flex facility.

FLXP6 is a 10-color existing permitted (second) Fischer & Krecke flexographic printing press, was installed on 2/28/2003. This FLXP6 printing press is designated as PRESS # 2 at the Ultra Flex facility.

FLXP7 is a 10-color permitted (third) Fischer & Krecke flexographic printing press. This FLXP7 printing press will be designated as PRESS # 3 at the Ultra Flex facility, which is a proposed future installation.

The facility's potential emissions for volatile organic compounds exceed the major source threshold of 25 tons in non-attainment areas and ozone transport regions. As a result of the NYCRR Part 231-2 (New Source Review in non-attainment areas and ozone transport regions) applicability evaluation for the RTO, there is no increase in the Maximum Annual Potential (MAP) of the emission unit, nor for the facility. As a result of the 6 NYCRR Part 231-2 (New Source Review) in non-attainment areas and ozone transport regions applicability evaluation for the replacement of the printing presses, there is an increase of 3.8 tons of VOC in the Maximum Annual Potential (MAP) of the facility. Two new state-of-the-art Fischer & Krecke flexographic printing presses (Emission Sources FLX06 & FLX07) replaced four MAF 140 flexographic printing presses (Emission Sources FLXP1, FLXP2, FLXP3 & FLXP4). Therefore, as a result of the replacement of the printing presses and the VOC emissions increase, the facility is not subject to Part 231-2 (New Source Review). The new regenerative thermal oxidizer and the resulting emissions from the new flexographic printing press configuration at this facility will not provide an increase beyond the facility's currently permitted VOC emissions of 91 TPY. Therefore, this facility is not subject to Part 231-2 (New Source Review), and there are no changes to any lamination-related processes.

Attainment Status

ULTRA FLEX PKG CORP-975 ESSEX ST is located in the town of BROOKLYN in the county of KINGS.

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



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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

Ultra Flex Packaging Corporation is located at 975 Essex Street in Brooklyn, New York. Ultra Flex operates three 10-color flexographic printing presses and one laminator ducted to the Regenerative Thermal Oxidizer (RTO) to produce flexible packaging materials. The facility creates VOC emissions that are currently processed through a natural gas fired regenerative thermal oxidizer with a destruction efficiency of 95% before emitting to the environment. The facility is subject to the requirements of 6 NYCRR Parts 226, 228, 234 and 40 CFR 63 Subparts A and KK. The facility complies with all federal and state requirements by maintaining a permanent total enclosure and will be operating an RTO (Regenerative Thermal Oxidizer) with minimum inlet temperature at 1500 degrees Fahrenheit, and with a minimum destruction efficiency of 95 %. This facility is a minor source and not a major source of HAPs. However, this facility is a major source of VOC. The Title V renewal contains a complete listing of the applicable federal, state and compliance monitoring requirements for the facility, its emission unit and emission point.

Ultra Flex Packaging Corporation has been under an internal pollution prevention and equipment upgrade program for the past few years to reduce overall solvent use and contaminant emissions. Other such measures have included the first Fischer & Krecke state-of-the-art printing press (Emission Source FLX05) and the new regenerative thermal oxidizer (RTO) control technology to improve the VOC destruction efficiency and accommodate subsequent new printing presses. Two new 10-color (each) state-of-the-art Fischer & Krecke flexographic printing presses (Emission Sources FLX06 & FLX07) replaced four MAF 140 flexographic printing presses (Emission Sources FLXP1, FLXP2, FLXP3 & FLXP4) in 2003, of which two were 6-color and the other two were 8-color.

The facility's potential emissions for volatile organic compounds exceed the major source threshold of 25 tons in non-attainment areas and ozone transport regions. As a result of the NYCRR Part 231-2 (New Source Review in non-attainment areas and ozone transport regions) applicability evaluation for the RTO, there is no increase in the Maximum Annual Potential (MAP) of the emission unit, nor for the facility. As a result of the 6 NYCRR Part 231-2 (New Source Review) in non-attainment areas and ozone transport regions applicability evaluation for the replacement of the printing presses, there is an increase of 3.8 tons of VOC in the Maximum Annual Potential (MAP) of the facility. Two new state-of-the-art Fischer & Krecke flexographic printing presses (Emission Sources FLX06 & FLX07) replaced four MAF 140 flexographic printing presses (Emission Sources FLXP1, FLXP2, FLXP3 & FLXP4). Therefore, as a result of the replacement of the printing presses and the VOC emissions increase, the facility is not subject to Part 231-2 (New Source Review). The new regenerative thermal oxidizer and the resulting emissions from the new flexographic printing press configuration at this facility will not provide



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an increase beyond the facility's currently permitted VOC emissions of 91 TPY. Therefore, this facility is not subject to Part 231-2 (New Source Review), and there are no changes to any lamination-related processes.

The facility operates other sources which are considered exempt from permitting in accordance with 6 NYCRR 201-3.2(c), they are:

- (10) natural gas fired unit heaters (each unit < 10 MM Btu/hr)
- (3) Compressor Engines (<225 HP),
- (1) non-contact cooling tower,
- (1) storage tank (<10,000 gallons),
- (1) non-vapor phase cleaning tank,
- (1) exhaust system for paint mixing, and
- (1) exhaust system for solvent transfer.

Permit Structure and Description of Operations

The Title V permit for ULTRA FLEX PKG CORP-975 ESSEX ST 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.

ULTRA FLEX PKG CORP-975 ESSEX ST is defined by the following emission unit(s):

Emission unit U00001 - Emission unit U-00001 consists of three (3) new Fischer & Krecke flexographic printing presses (FLX05, FLX06 & FLX07) vented to a regenerative thermal oxidizer for control of VOC. The four (4) MAF printing presses (FLXP1, FLXP2, FLXP3 & FLXP4) have been all removed, in which two were 6-color and the other two were 8-color. Three of the MAF printing presses

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(FLXP1, FLXP2 & FLXP4) were removed when the second Fischer & Krecke Press (FLX06) was installed on 2/28/2003, and the fourth MAF printing press (FLXP3) was removed on 2/28/2003 as well. At the same time the facility began operation of a new Fischer & Krecke flexographic printing press (FLX05) that was incorporated into the first Title V permit, but not operated until 4/1/2002. The two new Fischer & Krecke flexographic printing presses (FLX06 & FLX07) are identical to the FLX05, all three are 10-color printing presses. The Fischer & Krecke press (FLX07) is a proposed future installation.

The facility creates VOC emissions that are processed through a regenerative thermal oxidizer with a destruction efficiency of 95% before emitting to the environment.

In addition to these printing presses, Emission Unit U-00001 consists of Emission Point 00001 for venting emissions of flexographic printing presses and a laminator through a regenerative thermal oxidizer, Process OXD for the regenerative thermal oxidizer, and Emission Source/Control P0OXD/C0OXD for the regenerative thermal oxidizer. In addition, Emission Unit U-00001 has a laminator, identified as Emission Source LAMNT.

Emission unit U00001 is associated with the following emission points (EP):
00001

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

Process: 005 is located at 1, Building MAIN - Process 005 is the operation of the laminator (Emission Source LAMNT), in which its emissions vent through a regenerative thermal oxidizer. The laminator's corresponding emission point is Emission Point 00001, and its corresponding Emission Unit is U-00001.
Process: 050 is located at 1, Building MAIN - Process 050 is the operation of Flexographic Printing Press # 5 (Emission Source FLX05), which is a 10-color flexographic printing press. Its corresponding emission point is Emission Point 00001, and its corresponding Emission Unit is U-00001.
Process: 060 is located at 1, Building MAIN - Process 060 is the operation of Flexographic Printing Press # 6 (Emission Source FLX06), which is a 10-color flexographic printing press. Its corresponding emission point is Emission Point 00001, and its corresponding Emission Unit is U-00001.
Process: 070 is located at 1, Building MAIN - Process 070 is the operation of Flexographic Printing Press # 7 (Emission Source FLX07), which is a 10-color flexographic printing press. Its corresponding emission point is Emission Point 00001, and its corresponding Emission Unit is U-00001.
Process: OXD is located at TOP OF ROOF, Building MAIN - Process OXD is the venting of VOC emissions from flexographic printing presses to a Regenerative Thermal Oxidizer (RTO) for control of VOC emissions. VOC destruction efficiency is 95%. Its corresponding Emission Source/Control is P0OXD/C0OXD for the regenerative thermal oxidizer.

The following information was obtained through Anguil, the RTO manufacturer:

Air flow range: 4300-40,000 SCFM from process,
RTO operating temperature: 1500 degrees Fahrenheit,
RTO chamber residence time: 0.75 seconds at full flow
Stack diameter: 54",
Stack elevation: 30' above roof platform
Burner installed capacity: 10.3 MM Btu/hr,
Expected burner usage: 0.6 - 4.8 MM Btu/hr,

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VOC destruction required: 95%.

Emission unit U00002 - Emission Unit U-00002 consists of a Renzmann Automated Parts Washing System, identified as Emission Source RENZM. Its corresponding emission point is Emission Point 00002, and its corresponding process is Process 010.

Emission unit U00002 is associated with the following emission points (EP):
00002

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

Process: 010 is located at 1, Building MAIN - Process 010 is the operation of the Renzmann Parts Washer System, Model 202-26. Its corresponding emission point is Emission Point 00002, and its corresponding Emission Unit is U-00002.

Emission unit U00003 - Emission Unit U-00003 consists of a 195 HP natural gas fired compressor engine (Compressor # 1), identified as Emission Source COMP1. Its corresponding emission point is Emission Point 00003, and its corresponding process is Process 006.

Emission unit U00003 is associated with the following emission points (EP):
00003

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

Process: 006 is located at 1, Building MAIN - Process 006 is the firing of natural gas in the 195 HP compressor engine # 1 (Emission Source COMP1). Its corresponding emission point is Emission Point 00003, and its corresponding Emission Unit is U-00003.

Emission unit U00004 - Emission Unit U-00004 consists of a 195 HP natural gas fired compressor engine (Compressor # 2), identified as Emission Source COMP2. Its corresponding emission point is Emission Point 00004, and its corresponding process is Process 007.

Emission unit U00004 is associated with the following emission points (EP):
00004

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

Process: 007 is located at 1, Building MAIN - Process 007 is the firing of natural gas in the 195 HP compressor engine # 2 (Emission Source COMP2). Its corresponding emission point is Emission Point 00004, and its corresponding Emission Unit is U-00004.

Emission unit U00005 - Emission Unit U-00005 consists of a 95 HP natural gas fired compressor engine (Compressor # 3), identified as Emission Source COMP3. Its corresponding emission point is Emission Point 00005, and its corresponding process is Process 008.

Emission unit U00005 is associated with the following emission points (EP):
00005

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

Process: 008 is located at 1, Building MAIN - Process 008 is the firing of natural gas in the 95 HP compressor engine # 3 (Emission Source COMP3). Its corresponding emission point is Emission Point 00005, and its corresponding Emission Unit is U-00005.

Title V/Major Source Status

ULTRA FLEX PKG CORP-975 ESSEX ST is subject to Title V requirements. This determination is

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based on the following information:

Ultra Flex Packaging Corporation is a major stationary source subject to the Title V requirements because the potential emissions of volatile organic compounds (VOC) exceed the major source threshold of 25 tons per year for severe nonattainment ozone areas. However, this facility is a minor and not a major source of HAPs. Potential emissions of any individual HAP is below the 10 tons per year of any individual HAP and below the 25 tons per year of total HAPs based on a 12-month rolling average.

Program Applicability

The following chart summarizes the applicability of ULTRA FLEX PKG CORP-975 ESSEX ST 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)	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

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(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



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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
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
2-02-002-52	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS INTERNAL COMBUSTION ENGINE - INDUSTRIAL: NATURAL GAS:2-CYCLE LEAN BURN
4-01-003-99	ORGANIC SOLVENT EVAPORATION COLD SOLVENT CLEANING/STRIPPING Other Not Classified
4-05-005-11	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Gravure - 2754
4-05-003-11	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL PRINTING - FLOXOGRAPHIC

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

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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		>= 10 tpy but < 25 tpy
007439-92-1	LEAD (HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 2.5 tpy but < 10 tpy
0NY075-00-0	PARTICULATES		> 0 but < 2.5 tpy
0NY075-00-5	PM-10		> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy
0NY998-00-0	VOC		>= 50 tpy but < 100 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6NYCRR Part 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

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contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 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 6NYCRR 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 - 6NYCRR Part 201-6.5(a)(5)

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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 Part 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;

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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 201-6.7 and Part 621.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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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.

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Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	109
U-00001	40CFR 63-A.6 (b) (2)	Compliance dates for new and reconstructed sources	53
FACILITY	40CFR 63-KK.820 (a)	Printing and Publishing NESHAP-applicability	33
U-00001/00001	40CFR 63-KK.825 (b) (7)	Printing and Publishing NESHAP- standard: product and packaging rotogravure and wide-web flexographic printing	67
U-00001/00001	40CFR 63-KK.825 (d) (1)	Printing and Publishing NESHAP- demonstration of compliance with overall organic HAP control efficiency	68
FACILITY	40CFR 63-KK.825 (e)	Printing and Publishing NESHAP-standard: product and packing rotogravure and wide-web flexographic printing	34
U-00001	40CFR 63-KK.825 (f) (3)	Standards: Product and packaging rotogravure and wide-web flexographic printing	54
U-00001/00001	40CFR 63-KK.825 (h) (3)	Standards: Product and packaging rotogravure and wide-web flexographic printing	69
U-00001	40CFR 63-KK.826 (a)	Printing and Publishing NESHAP-compliance dates	55
U-00001	40CFR 63-KK.827 (d)	Printing and Publishing NESHAP-performance test methods	56
U-00001/00001	40CFR 63-KK.827 (e) (1)	Performance test methods	70
U-00001	40CFR 63-KK.828 (a) (2) (ii)	Monitoring requirements	57
U-00001	40CFR 63-KK.828 (a) (4) (i)	Monitoring Requirements for Oxidizers (not catalytic)	58
U-00001	40CFR 63-KK.828 (a) (4) (ii)	Monitoring requirements	59
U-00001	40CFR 63-KK.828 (a) (5)	Monitoring requirements	60
U-00001	40CFR 63-KK.828 (a) (5) (iii)	Monitoring requirements)	61
U-00001	40CFR 63-KK.829 (b)	Printing and Publishing NESHAP- Recordkeeping	62
FACILITY	40CFR 63-KK.829 (b) (1)	Recordkeeping requirements	35
U-00001/00001/050/FLX05	40CFR 63-KK.829 (b) (1)	Recordkeeping requirements	82
U-00001/00001/060/FLX06	40CFR 63-KK.829 (b) (1)	Recordkeeping requirements	89
U-00001/00001/070/FLX07	40CFR 63-KK.829 (b) (1)	Recordkeeping	95

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U-00001	40CFR 63-KK.830(b)(2)	Printing and Publishing	36
U-00001	40CFR 63-KK.830(b)(3)	NESHAP- Recordkeeping	63
FACILITY	40CFR 68	Printing and Publishing	64
FACILITY	40CFR 82-F	NESHAP- Reporting	64
FACILITY	6NYCRR 200.6	requirements	21
FACILITY	6NYCRR 200.7	Chemical accident	21
FACILITY	6NYCRR 201-1.4	prevention provisions	22
FACILITY	6NYCRR 201-1.7	Protection of	22
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FACILITY	6NYCRR 201-3.2(a)	recycling and emissions	
FACILITY	6NYCRR 201-3.3(a)	reduction	1
FACILITY	6NYCRR 201-6	Acceptable ambient air	10
FACILITY	6NYCRR 201-6.5(a)(4)	quality.	10
FACILITY	6NYCRR 201-6.5(a)(7)	Maintenance of equipment.	110
Fees 2	6NYCRR 201-6.5(a)(8)	Unavoidable noncompliance	110
FACILITY	6NYCRR 201-6.5(c)	and violations	11
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U-00002	6NYCRR 226.2	General Requirments	99
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U-00002	6NYCRR 226.3 (a)	Equipent specifications-cold cleaning	101
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U-00005/00005/008/COMP3	6NYCRR 227-1.3 (a) (1)	Smoke Emission Limitations.	107
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U-00001/00001/005/LAMNT	6NYCRR 228.10 (b)	Open containers- spent or fresh VOC	73
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U-00001/00001/005/LAMNT	6NYCRR 228.10 (e)	Open containers- store, dispose of coatings, VOCs, solvents	76
U-00001	6NYCRR 228.3 (b)	VOC incinerator- 80% overall removal efficiency	39
U-00001	6NYCRR 228.3 (c)	Solids as applied	40
FACILITY	6NYCRR 228.5 (a)	VOC recordkeeping by the facility	31
U-00001	6NYCRR 228.5 (d)	Department Access to Obtain Samples	41
U-00001	6NYCRR 228.5 (e) (1)	Demonstration by directly measuring VOC/solvent recovery	42
U-00001	6NYCRR 228.5 (e) (2)	Demonstration of other than VOC solvent recovery	43
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U-00001	6NYCRR 234.3 (e)	Graphic Arts - control requirements - opacity	48
U-00001	6NYCRR 234.4 (a)	Testing, monitoring, and recordkeeping	49
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FACILITY	6NYCRR 234.4 (b) (3)	Testing, Monitoring and Recordkeeping - purchase, usage and/or production records for inks, VOC and solvents	32
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U-00001/00001/060/FLX06	6NYCRR 234.4 (b) (3)	Testing, Monitoring and Recordkeeping - purchase, usage and/or production records for inks, VOC and solvents	83
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U-00001/00001/050/FLX05	6NYCRR 234.6 (a)	Handling, storage and disposal of volatile organic compounds (VOC).	78
U-00001/00001/060/FLX06	6NYCRR 234.6 (a)	Handling, storage and disposal of volatile organic compounds (VOC).	85
U-00001/00001/070/FLX07	6NYCRR 234.6 (a)	Handling, storage and disposal of volatile organic compounds (VOC).	91
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Applicability Discussion:

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

ECL 19-301.

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.

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 201-1.4

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.

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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 201-3.2(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)

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 201-6

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 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.

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The request may include copies of records required to be kept by the permit.

6NYCRR 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.

6NYCRR 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.

6NYCRR Part 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.

6NYCRR Part 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.

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.

6NYCRR Part 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.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule.

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It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

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 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.

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.

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6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their 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, ULTRA FLEX PKG CORP-975 ESSEX ST has been determined to be subject to the following regulations:

40CFR 63-A.6 (b) (2)

This condition requires new sources constructed or reconstructed after the effective date of a MACT standard to comply upon startup.

40CFR 63-KK.820 (a)

This requirement pertains to Printing and Publishing NESHAP - applicability of MACT (section 63 NESHAPS).

This regulation requires that the owner or operator of this facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated shall use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, for the purpose of establishing the facility to be an area source with respect to this 40CFR60 subpart KK.

The provisions of 40 CFR 63 Subpart KK apply to:

1. Each new and existing facility that is a major source of hazardous air pollutants, as defined in 40 CFR 63.2, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic

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printing presses are operated, and

2. each new and existing facility at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated and for which the owner or operator chooses to commit to, and meets the criteria of paragraphs (a)(2)(i) and (a)(2)(ii) of section 63.820 for purposes of establishing the facility to be an area source with respect to Subpart KK.

40CFR 63-KK.825 (b) (7)

This requirement pertains to Printing and Publishing NESHAP - standard: product and packaging rotogravure and wide-web flexographic printing of MACT (Section 63 NESHAPS).

This regulation pertains to the control requirements for product and packaging rotogravure or wide-web flexographic presses.

This regulation requires that the owner or operator of a product and packaging rotogravure or a wide-web flexographic printing press that is utilizing a control device to comply with subpart KK shall operate the capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95% for each month.

Monitoring of the control device must be performed in accordance with specifications described in Subpart KK.

40CFR 63-KK.825 (d) (1)

This requirement pertains to Printing and Publishing NESHAP - demonstration of compliance with overall organic HAP control efficiency of MACT (Section 63 NESHAPS).

This regulation requires the facility to demonstrate compliance with the overall organic HAP control efficiency requirements in section 63.825(b)(7) or the overall organic HAP emission rate limitation requirements in section 63.825(b)(8)-(10), each owner or operator using an oxidizer to control emissions shall show compliance by following the procedures in either paragraph (d)(1) or (d)(2) of section 63.825.

40CFR 63-KK.825 (e)

This requirement pertains to Printing and Publishing NESHAP-standard: product and packing rotogravure and wide-web flexographic printing of MACT (Section 63 NESHAPS).

Calculation of allowable monthly HAP emissions:

This regulation requires that owners or operators of a facility subject to Subpart KK may calculate the monthly allowable HAP emissions, for demonstrating compliance in accordance with paragraph (b)(6), (c)(1)(xi)(D), (c)(2)(xi)(D), or (d)(1)(xi)(D) of section 63.825 as follows:

1. Determine the as-purchased mass of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month,
2. Determine the as-purchased solids content of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, in accordance with section 63.827(c)(2),

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3. Determine the as-purchased mass fraction of each ink, coating, varnish, adhesive, primer, and other solids-containing material which was applied at 20 weight percent or greater solids content, on an as-applied basis,
4. Determine the total mass of each solvent, diluent, thinner, or reducer added to materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, each month,
5. Calculate the monthly allowable HAP emissions using Equation 17 of Subpart KK.

40CFR 63-KK.825 (f) (3)

This requirement pertains to Printing and Publishing NESHAP - Monitoring of capture system and control device parameters.

This requirement pertains to - Standards: Product and packaging rotogravure and wide-web flexographic printing of MACT (Section 63 NESHAPS).

This regulation requires that the owner or operator of each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance through performance tests of capture efficiency and control device efficiency and continuous compliance through continuous monitoring of capture system and control device operating parameters shall:

1. Monitor an operating parameter established in accordance with section 63.828(a)(4) to assure control device efficiency, and
2. For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with section 63.828(a)(5) to assure capture efficiency, and
3. Determine the organic HAP emissions for those presses served by each capture system delivering emissions to that oxidizer according to the requirements of 40 CFR 63.825(f)(3)(iii)(A) or (B).

40CFR 63-KK.825 (h) (3)

This requirement pertains to Printing and Publishing NESHAP Standards - Product and packaging rotogravure and wide-web flexographic printing.

This requirement pertains to compliance with capture and control requirements of MACT (Section 63 NESHAPS).

If a Subpart KK-affected source operates more than one capture system or more than one control device, and has no never-controlled work stations and no intermittently-controllable work stations, then the affected source is in compliance with 95 percent overall organic HAP control efficiency requirement for the month if all three of the following conditions are met:

1. For each press or group of presses controlled by a common control device, the overall organic HAP control efficiency, as determined by paragraphs (d)(1)(i)-(iii) and (d)(1)(x) of section 63.825 for each

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press or group of presses served by that control device and a common capture system, must be equal to or greater than 95 percent,

2. The oxidizer must be operated such that the average operating parameter value is greater than the operating parameter value established in accordance with section 63.828(a)(4) for each three hour period, and

3. The average capture system operating parameter value for each capture system serving that control device must be greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with section 63.828(a)(5) for each three hour period.

40CFR 63-KK.826 (a)

This requirement pertains to Printing and Publishing NESHAP - compliance dates for an existing source of MACT (Section 63 NESHAPS).

The compliance date for an owner or operator of an existing affected source subject to 40 CFR 63 Subpart KK is May 30, 1999.

40CFR 63-KK.827 (d)

This requirement pertains to Printing and Publishing NESHAP - performance test methods of MACT (Section 63 NESHAPS) for required procedures for initial performance test of an oxidizer.

This regulation requires the facility to conduct a performance test of a control device to determine destruction efficiency for the purpose of meeting the requirements of section 63.824-63.825 of Subpart KK shall be conducted by the owner or operator in accordance with the following:

1. An initial performance test to establish the destruction efficiency of an oxidizer and the associated combustion zone temperature for a thermal oxidizer (or the associated catalyst bed inlet temperature for a catalytic oxidizer) shall be conducted and the data reduced in accordance with the reference methods and procedures outlined in 63.827(d)(1)(i) through 63.827(d)(1)(ix).

2. The owner or operator shall record such process information as may be necessary to determine the conditions of the performance test.

3. For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuous compliance, the time-weighted average of the values recorded during the performance test shall be computed. For an oxidizer other than a catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum combustion temperature. For a catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum gas temperature upstream of the catalytic bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of sections 63.824-63.825 of Subpart KK.

40CFR 63-KK.827 (e) (1)

This requirement pertains to Printing and Publishing NESHAP - monitoring requirements.

This requirement pertains to Performance test methods for MACT (Section 63 NESHAPS) - procedures

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for determining capture efficiency.

This regulation requires the facility to conduct a performance test to determine the capture efficiency of each capture system venting organic emissions to a control device, for the purpose of meeting the requirements of sections 63.824(b)(1)(ii), 63.824(b)(2), 63.825(c)(2), 63.825(d)(1)-(2), 63.825(f)(2)-(4), or 63.825(h)(2)-(3), shall be conducted by the owner or operator.

For Permanent Total Enclosures, capture efficiency shall be assumed as 100 percent. Procedure T-"Criteria for the Verification of a Permanent or Temporary Total Enclosure", as found in appendix B to 40 CFR 52.741, shall be used to confirm that an enclosure meets the requirements for Permanent Total Enclosure.

40CFR 63-KK.828 (a) (2) (ii)

This requirement pertains to Printing and Publishing NESHAP - monitoring requirements.

This requirement pertains to calibration of temperature monitoring equipment of MACT (Section 63 NESHAPS).

All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced.

The replacement shall be done either if the owner chooses not to perform the calibration or if the equipment can not be calibrated properly.

40CFR 63-KK.828 (a) (4) (i)

This regulation sets forth the monitoring requirements for facilities that use an oxidizer, other than a catalytic oxidizer to control VOCs from a printing operation. The owner or operator must monitor the temperature in the combustion zone of the oxidizer.

40CFR 63-KK.828 (a) (4) (ii)

This requirement pertains to Printing and Publishing NESHAP - monitoring requirements.

This requirement pertains to temperature monitoring for a catalytic oxidizer for MACT (Section 63 NESHAPS).

This regulation requires that an owner or operator complying with the requirements of 40 CFR 63.824-63.825 through the use of a catalytic oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall install, calibrate, operate and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of +/-1 percent of the temperature being monitored in degrees Celsius or +/-1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

40CFR 63-KK.828 (a) (5)

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This requirement pertains to Printing and Publishing NESHAP - monitoring requirements.

This requirement pertains to procedures for establishing continuous parameter monitoring for capture efficiency of MACT (Section 63 NESHAPS).

This regulation requires that an owner or operator complying with the requirements of sections 63.824-63.825 through the use of a control device and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained shall:

1. Submit to the Administrator with the compliance status report required by section 63.9(h) of the General Provisions, a plan that:

- A) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained,
- B) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and
- C) Identifies the specific monitoring procedures;

2. Set the operating parameter value, or range of values, that demonstrate compliance with sections 63.824-63.825, and

3. Conduct monitoring in accordance with the plan submitted to the Administrator unless comments received from the Administrator require an alternative monitoring scheme.

40CFR 63-KK.828 (a) (5) (iii)

This pertains to Printing and Publishing NESHAP.

This requirement pertains to monitoring requirements of MACT (SECTION 63 NESHAPS).

40CFR 63-KK.829 (b)

This pertains to Printing and Publishing NESHAP - Recordkeeping for monthly record keeping requirements for Major Sources only (excludes the 63.829(b)(2) requirement for keeping applicability determinations) of MACT (SECTION 63 NESHAPS).

This regulation requires that each owner or operator of an affected source subject to 40CFR Part 63 Subpart KK shall maintain the following records (as specified in paragraphs (b)(1) through (b)(3) of Section 63.829) on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):

(1) Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

(2) Records specified in 40CFR63.10(b)(3), for each applicability determination performed by the owner or operator in accordance with the requirement in 40CFR63.820(a), and

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(3) Records specified in 40CFR63.10(c) for each continuous monitoring system operated by the owner or operator in accordance with the requirements of 40CFR63.828(a).

40CFR 63-KK.829 (b) (1)

This pertains to monthly record keeping requirements for MACT (SECTION 63 NESHAPS).

This regulation requires that each owner or operator of an affected source subject to 40CFR Part 63 Subpart KK shall maintain the following records on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1) of Section 63.829) on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):

Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

40CFR 63-KK.829 (d)

This rule requires that owners or operators of each facility seeking designation as an area source must maintain records of all required measurements and calculations needed to demonstrate compliance with the criteria specified in § 63.820(a)(2). These criteria specify that to be designated an area source under this subpart the facility must use less than 9.1 Mg (10 tons) of each individual HAP and 22.7 Mg (25 tons) of total HAP compounds per rolling 12-month period. Records to be maintained include the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

40CFR 63-KK.830 (b) (2)

This requirement pertains to Printing and Publishing NESHAP - Reporting requirements for notification of performance test of MACT (SECTION NESHAPS).

This regulation requires that each owner or operator of an affected source subject to 40 CFR 63 Subpart KK shall submit a Notification of Performance Test, as specified in Section 63.7 and Section 63.9(e) of 40 CFR Part 63.

This notification, and the site-specific test plan required under Section 63.7(c)(2), shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter is identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.

40CFR 63-KK.830 (b) (3)

This requirement pertains to Printing and Publishing NESHAP - Reporting requirements for notification of compliance status of MACT (SECTION 63 NESHAPS).

This regulation requires that each owner or operator of an affected source subject to 40CFR63 Subpart KK shall submit a Notification of Compliance Status, as specified in 40CFR63.9(h), to the Administrator.

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6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 226 .2

This reference provides the general requirements that owners and operators of solvent metal cleaning machines must comply with in addition to the other applicable requirements in this part. The general requirements include the proper storage, transfer, and disposal of solvents, the integrity of the equipment must be maintained, a summary of the operating procedures must be displayed, covers are to be closed when a degreaser is not used, and a record of solvent consumption must be maintained for one year.

6NYCRR 226 .2 (a)

This rule is a general requirement and it pertains to limiting the solvent loss to 20% while being handled, stored, transferred or disposed of.

6NYCRR 226 .2 (e)

This rule is a general requirement and it pertains to keeping record of solvent consumption for five years.

6NYCRR 226 .3 (a)

This rule pertains to equipment specifications to be used while cold cleaning degreasing when the internal volume of the machine is greater than two gallons.

6NYCRR 226 .4 (a)

This rule pertains to operating practices required by a person conducting solvent metal cleaning. For cold cleaning degreasing, clean parts shall be drained at least 15 seconds or until dripping ceases.

6NYCRR 227-1.3 (a) (1)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-1.3 (a) (2)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 228 .1 (a)

This citation requires owners or operators of facilities containing a regulated coating line, to apply for an appropriate permit or registration; and specifies the information to be submitted with that application.

6NYCRR 228 .10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6NYCRR 228 .10 (a)

This citation specifies the procedures and protocols for the handling of containers used to store or dispose

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of cloth or paper impregnated with VOC except for sampling or inspection.

6NYCRR 228 .10 (b)

This citation specifies the procedures and protocols for the handling of containers used to store or dispose of spent or fresh VOC containing materials except for sampling or inspection.

6NYCRR 228 .10 (c)

This citation specifies the procedures and protocols for the handling of spray equipment clean-up post 1/1/2004.

6NYCRR 228 .10 (d)

This citation specifies the procedures and protocols for the storage, dispensing of coatings or inks that are in open containers except for sampling or inspection.

6NYCRR 228 .10 (e)

This citation specifies the procedures and protocols for the storage, dispensing of coatings or VOCs or solvents that are in open containers except for sampling or inspection.

6NYCRR 228 .3 (b)

This citation requires any volatile organic compound (VOC) incinerator, used as control equipment, to be designed and operated to provide a minimum of 80 percent overall removal efficiency. It also allows an owner or operator of a facility which uses a natural gas fired VOC incinerator as a control device, to shut down the VOC incinerator from November 1st through March 31st for the purposes of natural gas conservation, provided the Department has determined that this action will not jeopardize air quality.

6NYCRR 228 .3 (c)

This citation specifies a minimum 85 percent overall removal efficiency for an air cleaning device used as a control strategy and how to determine this efficiency.

6NYCRR 228 .5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228 , to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6NYCRR 228 .5 (d)

This citation allows representatives of the Department to obtain coating samples during reasonable business hours, for the purpose of determining compliance.

6NYCRR 228 .5 (e) (1)

This allows owners or operators who utilizes volatile organic compound (VOC)/ solvent recovery as the only control equipment, to determine compliance by directly measuring recovery and specifies the methods to determine removal efficiency.

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6NYCRR 228 .5 (e) (2)

This citation specifies how to evaluate control equipment other than volatile organic compound (VOC)/solvent recovery systems, and the methods to determine removal efficiency.

6NYCRR 228 .5 (f)

This citation requires the owner or operator of any emission source of a surface coating process subject to 6 NYCRR Part 228 to follow notification requirements, protocol requirements and test procedures of Part 202 of this Title for testing and monitoring of Methods 18, 25, and 25A.

- (1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;
- (2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or
- (3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

6NYCRR 228 .5 (g) (2)

This requires continuous monitors measure the temperature rise across catalytic incinerator bed when an air cleaning device is used.

6NYCRR 234 .3 (a)

The control strategies which can be used for packaging rotogravure, publication rotogravure or flexographic printing are outlined in section 234.3(a).

6NYCRR 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.

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 (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 .4 (a)

This requirement applies to printing operations which utilize control equipment to control emissions. It

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requires that test methods acceptable to the Department must be used when demonstrating the overall removal efficiency. This demonstration may be done in the following manner:

(1) By directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control technique. Methods described in Section 234.5(b)(1) and (b)(2) of this Part must be used.

(2) For control equipment other than VOC/solvent recovery, this demonstration must include provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of these air contaminants by control equipment prior to their release to the atmosphere.

6NYCRR 234 .4 (a) (2)

The overall removal efficiency of the control equipment used to comply with the requirements of Part 234 is determined by multiplying the efficiency of the capture system and the efficiency of the destruction and/or control equipment.

6NYCRR 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.

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 (c) (1)

This regulation requires any affected printing operation which uses an incinerator as an air cleaning device to control VOC emissions to install, operate and periodically calibrate instrumentation to monitor the exhaust gas temperature.

6NYCRR 234 .4 (c) (2)

The temperature rise across the catalytic bed must be continuously monitored.

6NYCRR 234 .4 (c) (4)

The facility is required to continuously monitor the following parameters: combustion chamber temperature.



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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.

6NYCRR 234 .6 (a)

Open containers may not be used to store or dispose of cloth or paper saturated with volatile organic compounds and/or solvents that are used for surface preparation, cleanup or ink/coating removal.

6NYCRR 234 .6 (b)

Spent or fresh volatile organic compounds and/or solvents used for surface preparation, cleanup or ink/coating removal may not be stored in open containers.

6NYCRR 234 .6 (c)

Open containers may not be used to store or dispose of inks and/or surface coatings.

6NYCRR 234 .6 (d)

Open containers may not be used to store or dispense inks and/or surface coatings unless operational access is required for production, maintenance, or inspection purposes.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Short Description	Regulation
FACILITY	New Source Review in Nonattainment Areas and Ozone Transport Region	6NYCRR 231-2
Reason: Printing press FLX05, which was included in the original Title V (ATV Mod 0), has potential annual emissions greater than 25 tons of volatile organic compounds which exceeds the applicability threshold specified in title 6 of the official compilation of the codes, rules and regulations of the state of New York, subpart 231-2 (NYCRR 231-2), "new source review (NSR) in non attainment areas and ozone transport regions". Ultra flex has chosen to limit the emissions of voc to 24.5 tpy based on a 12-month rolling total to avoid the requirements of 6 NYCRR 231-2.		
At all times ultra flex shall satisfy the Permanent Total Enclosure (PTE) requirement for the capture efficiency as specified in USEPA's "Guidelines for determining capture efficiency" method 204. The capture efficiency for VOC emissions from printing operations is assumed to be 100% if the criteria specified in Method 204 for PTE are met. The PTE is an enclosure that completely surrounds a source such that all volatile organic compound emissions are contained and directed to a control device. The PTE at the existing facility is extended to contain the new press. The control device is a natural gas fired Regenerative Thermal Oxidizer (RTO) contained in emission unit U-00001.		
The owner or operator of a flexographic printing process subject to this part, shall not operate, cause, allow or permit the operation of such processes unless the capture system and the air cleaning device provide for an overall reduction in volatile organic compound emissions of at least 60.0 percent. To comply with 6NYCRR 231-2, the facility has chosen to limit net emission increase of volatile		

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organic compounds below 25 tons based on 100% capture efficiency of the total room enclosure of the flexographic press and 95% destruction efficiency of each oxidizer. The required overall reduction in voc emissions shall therefore be increased to at least 95% for the oxidizer.

The permitted emission sources contributing to the facility VOC emissions include three flexographic presses (FLX05, FLX06 & FLX07), and a laminator in Emission Unit U-00001, and a renzmann automated washer in Emission Unit U-00002.

The permittee must maintain on an on going basis monthly usage and purchase records of all coatings and solvents utilized at the facility to verify the monthly and annual actual facility wide VOC emission rates.

The permittee shall submit a quarterly report in a format acceptable to the department reporting the following:

- a. monthly volatile organic compounds emissions for the each month of the reporting quarter.
- b. cumulative volatile organic compounds emissions for the consecutive 12- month period, on a monthly basis.

Documentation showing how monthly volatile organic emissions were calculated shall be maintained for a period of five years and made available to the department upon request.

U-00001/00001/OXD New Source Review in 6NYCRR 231-2
Nonattainment Areas and Ozone
Transport Region

Reason: The facility's potential emissions for volatile organic compounds exceed the major source threshold of 25 tons in non-attainment areas and ozone transport regions. As a result of the 6 NYCRR Part 231-2 (New Source Review) in non-attainment areas and ozone transport regions applicability evaluation for the proposed replacement of the printing presses, there is an increase of 3.8 tons of VOC in the Maximum Annual Potential (MAP) of the facility. Two (2) new state-of-the-art Fischer & Krecke flexographic printing presses (FLX06 & FLX07) will replace four (4) MAF 140 flexographic printing presses (FLXP1, FLXP2, FLXP3 & FLXP4). Therefore, as a result of the replacement of the printing presses and the VOC emissions increase, the facility is not subject to Part 231-2 (New Source Review).

There is no change in any permitted parameter, or applicable state or federal regulations. The facility will continue its normal daily operations insuring the current limitations on VOC emissions and hours of operations, based on its already permitted potential to emit (PTE of 91 TPY). The facility operates 24 hours/day @ 365 days/year = 8,544 hours/year.

The five-year contemporaneous period is 1998-2003. The facility is in the severe ozone non-attainment area, the Facility Emission Potential (FEP) is 91 TPY, which is > the Major Facility Size Threshold (MFST) of 25 TPY for VOC). The facility is > the Major Facility Size Threshold (MFST) of 25 TPY for VOC). The facility is therefore, a major facility.

The Project Emission Potential (PEP) for the replacement of the printing presses is 3.8 TPY, which is > the Significant Source Project Threshold (SSPT) of 2.5 TPY for VOC. PEP = 3.8 TPY > SSPT of 2.5 TPY.

The Net Emission Increase (NEI) for the replacement of the printing presses is 3.8 TPY and is < the Significant Net Emission Increase Threshold (SNEIT) of 25 TPY.

NEI = NEI for replacement of printing presses = 3.8 < SNEIT of 25

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TPY

Non-applicability Determination:

There is physical change (different presses) that brings about an increase in Maximum Annual Potential (MAP) emissions of 3.8 tons of VOC. Therefore, the modification project amounts to a total increase in potential emissions of 3.8 TPY. Since the net PTE increase is 3.8 TPY, which is < 25 TPY (SNEIT), Part 231 is not applicable to this facility.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at ULTRA FLEX PKG CORP-975 ESSEX ST:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
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Reason: This facility is located in a severe ozone non-attainment area. As a result of constructing the Regenerative Thermal Oxidizer (RTO), there is no increase in the Maximum Annual Potential (MAP) of the emission unit, nor for the facility. The existing catalytic oxidizer has a 95% destruction efficiency of VOC and the RTO will have the same destruction efficiency of VOC.

The existing Facility Emission Potential (FEP) is 91 TPY which is greater than the Major Facility VOC threshold of 25 TPY.

The Project Emission Potential (PEP) is 7.4 TPY which is greater than the Significant Source Project Threshold (SSPT) of 2.5 TPY.

The Net Emission Increase (NEI) is NOT greater than the Significant Net Emission Increase Threshold (SNEIT) of 25 TPY.

Therefore, the new oxidizer and resulting emissions and this facility is NOT subject to Part 231-2 (New Source Review).

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Basis for Monitoring

This facility is subject to the requirements of Title V. The facility is required, under the provisions of 6 NYCRR Subpart 201-6, to submit semiannual compliance reports and an annual Compliance Certification. This facility has to comply with the following monitoring conditions:

Condition # 5 for 6 NYCRR 201-6.5(c)(3)(ii): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures and applies to monitoring conditions in all Title V permits. All facilities that are issued Title V permits must submit reports of any required monitoring to the NYSDEC every six months. This condition 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.

Condition # 6 for 6 NYCRR 201-6.5(e): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition has requirement that applies to all Title V facilities. These facilities must submit an annual compliance certification to the NYSDEC and the USEPA. This condition specifies the overall permit requirements for compliance certification, including emission limitations, standards or work practices.

Condition # 7 for 6 NYCRR 202-2.1: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition sets forth the applicability criteria for submitting an annual statement of emissions. The criteria is based on annual emission threshold quantities and ozone attainment designation. This condition is a requirements for all Title V facilities. These facilities must submit an annual emission statement by April 15th of each year for emissions of the previous calendar year.

Condition # 24 for 6 NYCRR 201-6.5(c)(3): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition 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.

Condition # 26 for 6 NYCRR 202-2.5: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for VOC. This condition has requirements that apply to all Title V facilities. These facilities must submit an annual emission statement by April 15th of each year. This condition sets forth the applicability criteria for submitting an annual statement of emissions. The criteria is based on annual emission threshold quantities and ozone attainment designation.

Condition # 27 for 6 NYCRR 212.6(a): This is a facility-wide condition. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Opacity. This condition specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

Condition # 28 for 6 NYCRR 212.6(a): This is a facility-wide condition. This condition is for Record

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Keeping/Maintenance Procedures. This condition requires the facility to conduct EPA Method 9 once annually. This condition specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

Condition # 29 for 6 NYCRR 226.2(e): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for VOC. This condition is a general requirement and it pertains to keeping record of solvent consumption for five years. This condition also requires the facility to keep monthly records of materials purchase/usage and other VOC content. The facility is required to submit quarterly reports giving VOC emissions for each month and cumulative VOC emissions for the 12-month period, on a monthly basis.

Condition # 31 for 6 NYCRR 228.5(a): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for VOC. This condition requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228, to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

Condition # 32 for 6 NYCRR 234.4(b)(3): This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for VOC. 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.

Condition # 34 for 40 CFR 63.825(e), Subpart KK: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures. This condition pertains to Printing and Publishing NESHAP-standard: product and packing rotogravure and wide-web flexographic printing of MACT (Section 63 NESHAPS).

Calculation of allowable monthly HAP emissions:

This condition requires that owners or operators of a facility subject to Subpart KK may calculate the monthly allowable HAP emissions, for demonstrating compliance in accordance with paragraph (b)(6), (c)(1)(xi)(D), (c)(2)(xi)(D), or (d)(1)(xi)(D) of section 63.825 as follows:

1. Determine the as-purchased mass of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month,
2. Determine the as-purchased solids content of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, in accordance with section 63.827(c)(2),
3. Determine the as-purchased mass fraction of each ink, coating, varnish, adhesive, primer, and other solids-containing material which was applied at 20 weight percent or greater solids content, on an as-applied basis,

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4. Determine the total mass of each solvent, diluent, thinner, or reducer added to materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, each month,

5. Calculate the monthly allowable HAP emissions using Equation 17 of Subpart KK. □

Condition # 35 for 40 CFR 63.829(b)(1), Subpart KK: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for HAP. This pertains to monthly record keeping requirements for MACT (SECTION 63 NESHAPS).

This condition requires that each owner or operator of an affected source subject to 40CFR Part 63 Subpart KK shall maintain the following records on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1) of Section 63.829) on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):

Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

Condition # 36 for 40 CFR 63.829(d), Subpart KK: This is a facility-wide condition. This condition is for Record Keeping/Maintenance Procedures for HAP. This condition requires that owners or operators of each facility seeking designation as an area source must maintain records of all required measurements and calculations needed to demonstrate compliance with the criteria specified in § 63.820(a)(2). These criteria specify that to be designated an area source under this subpart the facility must use less than 9.1 Mg (10 tons) of each individual HAP and 22.7 Mg (25 tons) of total HAP compounds per rolling 12-month period. Records to be maintained include the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

Condition # 39 for 6 NYCRR 228.3(b): This condition is an emission unit level condition for EU: U-00001 for Intermittent Emission Testing for VOC for 80 percent reduction by weight. This condition requires any volatile organic compound (VOC) incinerator, used as control equipment, to be designed and operated to provide a minimum of 80 percent overall removal efficiency. It also allows an owner or operator of a facility which uses a natural gas fired VOC incinerator as a control device, to shut down the VOC incinerator from November 1st through March 31st for the purposes of natural gas conservation, provided the Department has determined that this action will not jeopardize air quality.

Condition # 44 for 6 NYCRR 228.5(f): This condition is an emission unit level condition for EU: U-00001 for Record Keeping/Maintenance Procedures for VOC. This condition requires the owner or operator of any emission source of a surface coating process subject to 6 NYCRR Part 228 to follow notification requirements, protocol requirements and test procedures of Part 202 of this Title for testing and monitoring of Methods 18, 25, and 25A.

(1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;

(2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or

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(3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

Condition # 45 for 6 NYCRR 228.10: This condition is an emission unit level condition for EU: U-00001 for Record Keeping/Maintenance Procedures. This condition specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

Condition # 46 for 6 NYCRR 234.3(a)(3)(iii): This condition is an emission unit level condition for EU: U-00001 for VOC for Intermittent Emission Testing for 60 percent reduction by weight. 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. □

Condition # 48 for 6 NYCRR 234.3(e): This condition is an emission unit level condition for EU: U-00001 for Monitoring of Process or Control Device Parameters as Surrogate for Opacity. The opacity limit is 10 percent. 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.

Condition # 50 for 6 NYCRR 234.4(a)(2): This condition is an emission unit level condition for EU: U-00001 for VOC for Intermittent Emission Testing for 60 percent reduction by weight. The overall removal efficiency of the control equipment used to comply with the requirements of Part 234 is determined by multiplying the efficiency of the capture system and the efficiency of the destruction and/or control equipment.

Condition # 52 for 6 NYCRR 234.6: This condition is an emission unit level condition for EU: U-00001 for Record Keeping/Maintenance Procedures. 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.

Condition # 56 for 40 CFR 63.827(d), Subpart KK: This condition is an emission unit level condition for EU: U-00001 for Monitoring of Process or Control Device Parameters as Surrogate for destruction efficiency. The destruction efficiency is required to be at least 95 percent reduction by weight. This requirement pertains to Printing and Publishing NESHAP - performance test methods of MACT (Section 63 NESHAPS) for required procedures for initial performance test of an oxidizer.

This condition requires the facility to conduct a performance test of a control device to determine destruction efficiency for the purpose of meeting the requirements of section 63.824-63.825 of Subpart KK shall be conducted by the owner or operator in accordance with the following:

1. An initial performance test to establish the destruction efficiency of an oxidizer and the associated

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combustion zone temperature for a thermal oxidizer (or the associated catalyst bed inlet temperature for a catalytic oxidizer) shall be conducted and the data reduced in accordance with the reference methods and procedures outlined in 63.827(d)(1)(i) through 63.827(d)(1)(ix).

2. The owner or operator shall record such process information as may be necessary to determine the conditions of the performance test.

3. For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuous compliance, the time-weighted average of the values recorded during the performance test shall be computed. For an oxidizer other than a catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum combustion temperature. For a catalytic oxidizer, the owner or operator shall establish as the operating parameter the minimum gas temperature upstream of the catalytic bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of sections 63.824-63.825 of Subpart KK.

Condition # 58 for 40 CFR 63.828(a)(4)(i), Subpart KK: This condition is an emission unit level condition for EU: U-00001 for HAP for Monitoring of Process or Control Device Parameters as Surrogate for the temperature in the combustion chamber of the oxidizer. This temperature cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously.

This condition sets forth the monitoring requirements for facilities that use an oxidizer, other than a catalytic oxidizer to control VOCs from a printing operation. The owner or operator must monitor the temperature in the combustion zone of the oxidizer.

Condition # 59 for 40 CFR 63.828(a)(4)(ii), Subpart KK: This condition is an emission unit level condition for EU: U-00001 for HAP for Monitoring of Process or Control Device Parameters as Surrogate for the temperature in the combustion chamber of the oxidizer. This temperature cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously.

This requirement pertains to Printing and Publishing NESHAP - monitoring requirements. This requirement pertains to temperature monitoring for a catalytic oxidizer for MACT (Section 63 NESHAPS).

This condition requires that an owner or operator complying with the requirements of 40 CFR 63.824-63.825 through the use of a catalytic oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall install, calibrate, operate and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of +/-1 percent of the temperature being monitored in degrees Celsius or +/-1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

Condition # 61 for 40 CFR 63.828(a)(5)(iii), Subpart KK: This condition is an emission unit level condition for EU: U-00001 for HAP for Monitoring of Process or Control Device Parameters as Surrogate for Pressure Change. The pressure differential across enclosure to ensure 100% capture efficiency of collecting organic HAP emissions into a closed-vent system that exhausts to the RTO has to be a minimum of -0.007 inches of water.

This condition pertains to Printing and Publishing NESHAP. This requirement pertains to monitoring

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requirements of MACT (SECTION 63 NESHAPS).

Condition # 62 for 40 CFR 63.829(b), Subpart KK: This condition is an emission unit level condition for EU: U-00001 for Record Keeping/Maintenance Procedures. This pertains to Printing and Publishing NESHAP - Recordkeeping for monthly record keeping requirements for Major Sources only (excludes the 63.829(b)(2) requirement for keeping applicability determinations) of MACT (SECTION 63 NESHAPS).

This condition requires that each owner or operator of an affected source subject to 40CFR Part 63 Subpart KK shall maintain the following records (as specified in paragraphs (b)(1) through (b)(3) of Section 63.829) on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):

- (1) Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.
- (2) Records specified in 40CFR63.10(b)(3), for each applicability determination performed by the owner or operator in accordance with the requirement in 40CFR63.820(a), and
- (3) Records specified in 40CFR63.10(c) for each continuous monitoring system operated by the owner or operator in accordance with the requirements of 40CFR63.828(a).

Condition # 65 for 6 NYCRR 228.5(g)(2): This condition is an emission unit level and emission point level condition for VOC Monitoring of Process or Control Device Parameters as Surrogate for temperature that applies to EU: U-00001 & EP: 00001. The temperature of the combustion chamber of the oxidizer has to be continuously monitored and be at a minimum of 1500 degrees Fahrenheit.

This condition requires continuous monitors that measure the temperature rise across catalytic incinerator bed when an air cleaning device is used.

Condition # 66 for 6 NYCRR 234.4(c)(2): This condition is an emission unit level and emission point level condition for VOC Monitoring of Process or Control Device Parameters as Surrogate for temperature that applies to EU: U-00001 & EP: 00001. The temperature of the combustion chamber of the oxidizer has to be continuously monitored and be at a minimum of 1500 degrees Fahrenheit.

This condition requires that the temperature rise across the catalytic bed must be continuously monitored.

Condition # 68 for 40 CFR 63.825(d)(1), Subpart KK: This condition is an emission unit level and emission point level condition for HAP Monitoring of Process or Control Device Parameters as Surrogate for temperature that applies to EU: U-00001 & EP: 00001. The temperature of the combustion chamber of the oxidizer has to be continuously monitored and be at a minimum of 1500 degrees Fahrenheit.

This requirement pertains to Printing and Publishing NESHAP - demonstration of compliance with overall organic HAP control efficiency of MACT (Section 63 NESHAPS).

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This condition requires the facility to demonstrate compliance with the overall organic HAP control efficiency requirements in section 63.825(b)(7) or the overall organic HAP emission rate limitation requirements in section 63.825(b)(8)-(10), each owner or operator using an oxidizer to control emissions shall show compliance by following the procedures in either paragraph (d)(1) or (d)(2) of section 63.825.

Condition # 71 for 6 NYCRR 228.5(g)(2): This condition is an emission unit level, emission point level, process level and emission source level condition for VOC for Monitoring of Process or Control Device Parameters as Surrogate for temperature that applies to EU: U-00001, EP: 00001, Proc: 005 and ES: LAMNT. The temperature of the combustion chamber of the oxidizer has to be continuously monitored and be at a minimum of 1500 degrees Fahrenheit.

This condition requires continuous monitors to measure the temperature rise across catalytic incinerator bed when an air cleaning device is used.

Condition # 72 for 6 NYCRR 228.10(a): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 005 and ES: LAMNT.

This condition specifies the procedures and protocols for the handling of containers used to store or dispose of cloth or paper impregnated with VOC except for sampling or inspection.

Condition # 73 for 6 NYCRR 228.10(b): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 005 and ES: LAMNT.

This condition specifies the procedures and protocols for the handling of containers used to store or dispose of spent or fresh VOC containing materials except for sampling or inspection.

Condition # 74 for 6 NYCRR 228.10(c): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 005 and ES: LAMNT.

This condition specifies the procedures and protocols for the handling of spray equipment clean-up post 1/1/2004.

Condition # 75 for 6 NYCRR 228.10(d): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 005 and ES: LAMNT.

This condition specifies the procedures and protocols for the storage, dispensing of coatings or inks that are in open containers except for sampling or inspection.

Condition # 76 for 6 NYCRR 228.10(e): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 005 and ES: LAMNT.

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This condition specifies the procedures and protocols for the storage, dispensing of coatings or VOCs or solvents that are in open containers except for sampling or inspection.

Condition # 77 for 6 NYCRR 234.4(b)(3): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 050 and ES: FLX05.

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

Condition # 78 for 6 NYCRR 234.6(a): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 050 and ES: FLX05.

This condition specifies that open containers may not be used to store or dispose of cloth or paper saturated with volatile organic compounds and/or solvents that are used for surface preparation, cleanup or ink/coating removal.

Condition # 79 for 6 NYCRR 234.6(b): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 050 and ES: FLX05.

This condition specifies that spent or fresh volatile organic compounds and/or solvents used for surface preparation, cleanup or ink/coating removal may not be stored in open containers.

Condition # 80 for 6 NYCRR 234.6(c): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 050 and ES: FLX05.

This condition specifies that open containers may not be used to store or dispose of inks and/or surface coatings.

Condition # 81 for 6 NYCRR 234.6(d): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 050 and ES: FLX05.

This condition specifies that open containers may not be used to store or dispense inks and/or surface coatings unless operational access is required for production, maintenance, or inspection purposes.

Condition # 82 for 40 CFR 63.829(b)(1), Subpart KK: This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for HAP that applies to EU: U-00001, EP: 00001, Proc: 050 and ES: FLX05.

This condition pertains to monthly record keeping requirements for MACT (SECTION 63 NESHAPS). This condition requires that each owner or operator of an affected source subject to 40CFR Part 63

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Subpart KK shall maintain the following records on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1) of Section 63.829) on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):

Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

Condition # 83 for 6 NYCRR 234.4(b)(3): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 060 and ES: FLX06.

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

Condition # 84 for 6 NYCRR 234.4(b)(4): This condition is an emission unit level, emission point level, process level and emission source level condition for Monitoring of Process or Control Device Parameters as Surrogate for VOC for temperature that applies to EU: U-00001, EP: 00001, Proc: 060 and ES: FLX06. The temperature of the combustion chamber of the oxidizer has to be continuously monitored and be at a minimum of 1500 degrees Fahrenheit.

This condition requires continuous monitors to measure the temperature rise across catalytic incinerator bed when an air cleaning device is used.

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.

Condition # 85 for 6 NYCRR 234.6(a): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 060 and ES: FLX06.

This condition specifies that open containers may not be used to store or dispose of cloth or paper saturated with volatile organic compounds and/or solvents that are used for surface preparation, cleanup or ink/coating removal.

Condition # 86 for 6 NYCRR 234.6(b): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 060 and ES: FLX06.

This condition specifies that spent or fresh volatile organic compounds and/or solvents used for surface preparation, cleanup or ink/coating removal may not be stored in open containers.

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Condition # 87 for 6 NYCRR 234.6(c): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 060 and ES: FLX06.

This condition specifies that open containers may not be used to store or dispose of inks and/or surface coatings.

Condition # 88 for 6 NYCRR 234.6(d): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 060 and ES: FLX06.

This condition specifies that open containers may not be used to store or dispense inks and/or surface coatings unless operational access is required for production, maintenance, or inspection purposes.

Condition # 89 for 40 CFR 63.829(b)(1), Subpart KK: This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for HAP that applies to EU: U-00001, EP: 00001, Proc: 060 and ES: FLX06.

This condition pertains to monthly record keeping requirements for MACT (SECTION 63 NESHAPS). This condition requires that each owner or operator of an affected source subject to 40CFR Part 63 Subpart KK shall maintain the following records on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1) of Section 63.829) on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):

Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

Condition # 90 for 6 NYCRR 234.4(b)(3): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 070 and ES: FLX07.

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

Condition # 91 for 6 NYCRR 234.6(a): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 070 and ES: FLX07.

This condition specifies that open containers may not be used to store or dispose of cloth or paper saturated with volatile organic compounds and/or solvents that are used for surface preparation, cleanup or ink/coating removal.



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Condition # 92 for 6 NYCRR 234.6(b): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 070 and ES: FLX07.

This condition specifies that spent or fresh volatile organic compounds and/or solvents used for surface preparation, cleanup or ink/coating removal may not be stored in open containers.

Condition # 93 for 6 NYCRR 234.6(c): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 070 and ES: FLX07.

This condition specifies that open containers may not be used to store or dispose of inks and/or surface coatings.

Condition # 94 for 6 NYCRR 234.6(d): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for VOC that applies to EU: U-00001, EP: 00001, Proc: 070 and ES: FLX07.

This condition specifies that open containers may not be used to store or dispense inks and/or surface coatings unless operational access is required for production, maintenance, or inspection purposes.

Condition # 95 for 40 CFR 63.829(b)(1), Subpart KK: This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for HAP that applies to EU: U-00001, EP: 00001, Proc: 070 and ES: FLX07.

This condition pertains to monthly record keeping requirements for MACT (SECTION 63 NESHAPS). This condition requires that each owner or operator of an affected source subject to 40CFR Part 63 Subpart KK shall maintain the following records on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1) of Section 63.829) on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):

Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

Condition # 96 for 6 NYCRR 234.4(c)(4): This condition is an emission unit level, emission point level and process level condition for Continuous Emission Monitoring (CEM) for VOC that applies to EU: U-00001, EP: 00001 and Proc: OXD.

This condition sets forth the monitoring requirements for facilities that use an oxidizer, other than a catalytic oxidizer to control VOCs from a printing operation. The owner or operator must monitor the temperature in the combustion zone of the oxidizer. This temperature in the combustion chamber of the oxidizer cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously using Continuous Emission Monitoring (CEM).

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The facility is required to continuously monitor the following parameters: combustion chamber temperature.

Condition # 97 for 6 NYCRR 234.3(a): This condition is an emission unit level, emission point level, process level and emission source level condition for Monitoring of Process or Control Device Parameters as Surrogate for VOC for temperature that applies to EU: U-00001, EP: 00001, Proc: OXD and ES: COOXD.

This condition requires continuous monitors to measure the inlet temperature to the RTO (Regenerative Thermal Oxidizer) and hence the operating temperature of the RTO to be a minimum of 1500 degrees Fahrenheit.

The control strategies which can be used for packaging rotogravure, publication rotogravure or flexographic printing are outlined in section 234.3(a).

Condition # 98 for 6 NYCRR 234.4(c)(1): This condition is an emission unit level, emission point level, process level and emission source level condition for Monitoring of Process or Control Device Parameters as Surrogate for VOC for temperature that applies to EU: U-00001, EP: 00001, Proc: OXD and ES: COOXD. The temperature of the combustion chamber of the oxidizer (RTO) has to be continuously monitored and be at a minimum of 1500 degrees Fahrenheit.

This condition requires any affected printing operation which uses an incinerator as an air cleaning device to control VOC emissions to install, operate and periodically calibrate instrumentation to monitor the exhaust gas temperature.

Condition # 99 for 6 NYCRR 226.2: This condition is an emission unit level condition for Record Keeping/Maintenance Procedures for VOC that applies to EU: U-00002.

This condition provides the general requirements that owners and operators of solvent metal cleaning machines must comply with in addition to the other applicable requirements in this part. The general requirements include the proper storage, transfer, and disposal of solvents, the integrity of the equipment must be maintained, a summary of the operating procedures must be displayed, covers are to be closed when a degreaser is not used, and a record of solvent consumption must be maintained for one year.

Condition # 100 for 6 NYCRR 226.2(a): This condition is an emission unit level condition for Record Keeping/Maintenance Procedures for VOC that applies to EU: U-00002.

This condition is a general requirement and it pertains to limiting the solvent loss to 20% while being handled, stored, transferred or disposed of.

Condition # 101 for 6 NYCRR 226.3(a): This condition is an emission unit level condition for Record Keeping/Maintenance Procedures for VOC that applies to EU: U-00002.

This condition pertains to equipment specifications to be used while cold cleaning degreasing when the internal volume of the machine is greater than two gallons.

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Equipment with easily operated cover; equipment with internal (under cover) drainage, if practical.

Condition # 102 for 6 NYCRR 226.4(a): This condition is an emission unit level condition for Record Keeping/Maintenance Procedures for VOC that applies to EU: U-00002.

This condition pertains to operating practices required by a person conducting solvent metal cleaning. For cold cleaning degreasing, clean parts shall be drained at least 15 seconds or until dripping ceases.

The cleaned parts are required to be drained at least 15 seconds or until dripping ceases.

Condition # 103 for 6 NYCRR 227-1.3(a)(1): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures for HAP that applies to EU: U-00003, EP: 00003, Proc: 006 and ES: COMP1.

This condition prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

The stationary combustion source should be operated according to manufacturer's specifications.

Condition # 104 for 6 NYCRR 227-1.3(a)(2): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures that applies to EU: U-00003, EP: 00003, Proc: 006 and ES: COMP1.

This condition prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

The stationary combustion source should be operated according to manufacturer's specifications.

Condition # 105 for 6 NYCRR 227-1.3(a)(1): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures that applies to EU: U-00004, EP: 00004, Proc: 007 and ES: COMP2.

This condition prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

The stationary combustion source should be operated according to manufacturer's specifications.

Condition # 106 for 6 NYCRR 227-1.3(a)(2): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures that applies to EU: U-00004, EP: 00004, Proc: 007 and ES: COMP2.

This condition prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than

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27% opacity.

The stationary combustion source should be operated according to manufacturer's specifications.

Condition # 107 for 6 NYCRR 227-1.3(a)(1): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures that applies to EU: U-00005, EP: 00005, Proc: 008 and ES: COMP3.

This condition prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

The stationary combustion source should be operated according to manufacturer's specifications.

Condition # 108 for 6 NYCRR 227-1.3(a)(2): This condition is an emission unit level, emission point level, process level and emission source level condition for Record Keeping/ Maintenance Procedures that applies to EU: U-00005, EP: 00005, Proc: 008 and ES: COMP3.

This condition prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

The stationary combustion source should be operated according to manufacturer's specifications.