



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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: NYSDEC

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.

Summary Description of Proposed Project

Application for renewal of Air Title V Facility.

This is a Title V air permit renewal #2 application for Ultra Flex Packaging Corp. Currently, the facility



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

has a Title V permit that was issued on 3/2/2006 and is due to expire on 3/1/2011. The facility operates three 10-color flexographic printing presses and two laminators 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. This Title V Permit Renewal #2 consists of the Title V permit that was issued on 3/2/2006 and incorporates the Air State Facility Permit that was issued on 11/23/2010.

This Title V Permit Renewal #2 consists of the following:

1. The Air State Facility (ASF) permit application for the installation and operation of a new 20,000 cubic feet per minute Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 with 2 laminating stations (Emission Source LMNT2). The new laminator is capable of utilizing solvent, solvent-less, and aqueous lamination formulations. In order to avoid New Source Review applicability, the facility is proposing to limit the VOC emissions from this new lamination process (Process LMT) at 24 tons/year, which is below the 25 tpy threshold. Therefore; this project is not subject to New Source Review or Part 231-2.
2. Removing the following three natural gas fired Caterpillar Compressor Engines from the permit as permitted emission sources together with their corresponding emission unit, emission point, process and emission source since each engine is < 200 HP (electrical) and including them as exempt sources according to 6 NYCRR 201-3.2(c).
 - A. Emission Unit U-00003 consists of a 195 HP (electric) natural gas fired Caterpillar Compressor Engine # 1(Compressor # 1), identified as Emission Source COMP1. Its corresponding emission point is Emission Point 00003, and its corresponding process is Process 006.
 - B. Emission Unit U-00004 consists of a 195 HP (electric) natural gas fired Caterpillar Compressor Engine # 2 (Compressor # 2), identified as Emission Source COMP2. Its corresponding emission point is Emission Point 00004, and its corresponding process is Process 007.
 - C. Emission Unit U-00005 consists of a 95 HP (electric) natural gas fired Caterpillar Compressor Engine # 3(Compressor # 3), identified as Emission Source COMP3. Its corresponding emission point is Emission Point 00005, and its corresponding process is Process 008.

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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 (Emission Sources FLX05, FLX06 & FLX07) and two laminators (Emission Sources LAMNT & LAMN2) ducted to the Regenerative Thermal Oxidizers (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 a minimum inlet temperature of 1500 degrees Fahrenheit, and with a minimum destruction efficiency of 95%. The Title V renewal #2 contains a complete listing of the applicable federal, state and compliance monitoring requirements for the facility, its emission units, its emission points and its emission sources.

The facility is a major source of VOC (volatile Organic Compounds), but a minor source of Hazardous Air Pollutants (HAPs). The facility is required to demonstrate that the facility's emissions are 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 by maintaining records of all required measurements and emission calculations of any individual HAP and total HAPs from all activities at the facility. The facility is hence capping out of 40 CFR 63, Subpart KK (Printing and publishing NESHAP). A list of Hazardous Air Pollutants (HAPs) can be found in 6 NYCRR 200.1(ag).

In order to avoid 6 NYCRR 231-2 (New Source Review in non-attainment areas and ozone transport regions) applicability evaluation for the installation and operation of the new Nordmeccanica Triplex Combi Verticale Laminator (Emission Source LAMN2), the facility is choosing to limit the VOC emissions from this new source at 24 tpy. The new laminator is capable of utilizing solvent, solvent-less, and aqueous laminating formulations.

The facility operates several permitted sources under this renewal, they are as follows:

- (3) 10-color Fischer & Krecke flexographic printing presses (Emission Sources FLX05, FLX06 & FLX07) - Emission Sources FLX05, FLX06 & FLX07
- (1) Laminator - (15,000 cubic feet per minute Schiavi Laminator, Model 21000) - Emission Source LAMNT
- (1) Laminator - (20,000 cubic feet per minute Nordmeccanica Triplex Combi Verticale Laminator, Model L1500) - Emission source LAMN2
- (1) Regenerative Thermal Oxidizer (RTO) - 40,000 cubic feet per minute Anguil Regenerative Thermal Oxidizer Model 400 - Emission Source/Control P00XD/C00XD
- (1) Automated parts washing system - 4 pounds per hour Renzmann Parts Washer System, Model 202-26 - Emission Source RENZM 4 pounds per hour RENZMANN PARTS WASHER SYSTEM, MODEL



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

202-26

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

- (10) natural gas fired unit heaters (each unit < 10 MM Btu/hr)
- (3) Natural gas fired compressor engines (<225 HP),
- (3) Natural gas fired cogeneration units (< 200 Hp)
- (1) non-contact cooling tower,
- (1) storage tank (<10,000 gallons),
- (1) non-vapor phase cleaning tank,
- (1) Storage tank (< 10,000 gallons)
- (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 two (2) laminators (Emission Sources LAMN1 & LAMN2) and three (3) Fischer & Krecke flexographic printing presses (Emission Sources FLX05, FLX06 & FLX07). The emissions from the two laminators and the emissions from the three printing presses are vented to Emission point 00001 and then to a natural gas fired regenerative thermal oxidizer (Emission Source/Control P0OXD/C0OXD) for control of the VOC. Process OXD is for the operation of the regenerative thermal oxidizer. The three printing presses, FLX05, FLX06 and FLX07 are all identical to each other and each press is a 12,000 cubic feet per minute Fischer & Krecke 10-color printing press. One laminator is a 15,000 cubic feet per minute Schiavi laminator (Emission Source LAMN1) and the second laminator is a proposed new



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

20,000 cubic feet per minute Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 (Emission Source LAMN2).

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

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

Process: 005 is located at 1, Building MAIN - Process 005 is the lamination process of the two (2) laminators (Emission Sources LAMNT & LAMN2), in which their emissions vent through a regenerative thermal oxidizer (Emission Source/Control P00XD/C00XD). The two laminators' corresponding emission point is Emission Point 00001, and their corresponding Emission Unit is U-00001. The two laminators include the Schiavi Laminator (Emission Source LAMNT) and the new Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 (Emission Source LAMN2).

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. At Ultra Flex, Press FLX05 is designated as Press # 1.

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. At Ultra Flex, Press FLX06 is designated as Press # 2.

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. At Ultra Flex, Press FLX07 will be designated as Press # 3.

Process: OXD is located at TOP OF ROOF, Building MAIN - Process OXD is the venting of VOC emissions from the three flexographic printing presses (Emission Sources FLX05, FLX06 & FLX07) and emissions from the two (2) laminators (Emission Sources LAMNT & LAMN2) to a Regenerative Thermal Oxidizer (RTO) for control of VOC emissions. VOC destruction efficiency is 95%. Its corresponding Emission Source/Control is P00XD/C00XD for the regenerative thermal oxidizer.



**New York State Department of Environmental Conservation
Permit Review Report**

**Permit ID: 2-6105-00149/00006
Renewal Number: 2
03/24/2011**

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,
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

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

Title V/Major Source Status

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



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

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

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

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

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

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

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

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

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229,



**New York State Department of Environmental Conservation
Permit Review Report**

**Permit ID: 2-6105-00149/00006
Renewal Number: 2
03/24/2011**

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

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

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

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

SIC Code

Description

2759
7399

COMMERCIAL PRINTING, NEC
BUSINESS SERVICES, NEC(1977)

SCC Codes

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

SCC Code

Description

4-01-003-99

ORGANIC SOLVENT EVAPORATION
COLD SOLVENT CLEANING/STRIPPING
Other Not Classified

4-05-003-11

PRINTING/PUBLISHING
PRINTING/PUBLISHING - GENERAL
PRINTING - FLOXOGRAPHIC

4-05-005-11

PRINTING/PUBLISHING
PRINTING/PUBLISHING - GENERAL
Gravure - 2754

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 2-6105-00149/00006
Renewal Number: 2
03/24/2011

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 of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	Range
		lbs/yr	
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
000100-41-4	ETHYLBENZENE		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 10 tpy but < 25 tpy
007439-92-1	LEAD		> 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		>= 100 tpy but < 250 tpy
001330-20-7	XYLENE, M, O & P MIXT.		> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

occurrence of an emergency has the burden of proof.

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)

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

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

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 2-6105-00149/00006
Renewal Number: 2
03/24/2011

of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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

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

Item L: Permit Exclusion - ECL 19-0305

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

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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

Regulatory Analysis

New York State Department of Environmental Conservation
Permit Review Report



Permit ID: 2-6105-00149/00006
Renewal Number: 2
03/24/2011

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
--			
FACILITY	ECL 19-0301	98	Powers and Duties of the Department with respect to air pollution control
U-00001	40CFR 63-A.6 (b) (2)	51	Compliance dates for new and reconstructed sources
FACILITY	40CFR 63-KK	25, 26	Printing and Publishing NESHAP
FACILITY	40CFR 63-KK.820 (a)	36	Printing and Publishing NESHAP-applicability
U-00001/00001	40CFR 63-KK.825 (b) (7)	65	Printing and Publishing NESHAP-standard: product and packaging rotogravure and wide-web flexographic printing
U-00001/00001	40CFR 63-KK.825 (d) (1)	66	Printing and Publishing NESHAP-demonstration of compliance with overall organic HAP control efficiency
FACILITY	40CFR 63-KK.825 (e)	37	Printing and Publishing NESHAP-standard: product and packing rotogravure and wide-web flexographic printing
U-00001	40CFR 63-KK.825 (f) (3)	52	Standards: Product and packaging rotogravure and wide-web flexographic printing
U-00001/00001	40CFR 63-KK.825 (h) (3)	67	Standards: Product and packaging rotogravure and wide-web flexographic printing
U-00001	40CFR 63-KK.826 (a)	53	Printing and Publishing NESHAP-compliance dates
U-00001	40CFR 63-KK.827 (d)	54	Printing and Publishing NESHAP-performance test methods
U-00001/00001	40CFR 63-KK.827 (e) (1)	68	Performance test methods
U-00001	40CFR 63-KK.828 (a) (2) (i)	55	Monitoring requirements
U-00001	40CFR 63-KK.828 (a) (4) (i)	56	Monitoring Requirements for Oxidizers (not catalytic)
U-00001	40CFR 63-KK.828 (a) (4) (i)	57	Monitoring requirements



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

U-00001	40CFR 63-KK.828 (a) (5)	58	Monitoring requirements
U-00001	40CFR 63-KK.828 (a) (5) (i)	59	Monitoring requirements
U-00001	40CFR 63-KK.829 (b)	60	Printing and Publishing NESHAP-Recordkeeping
FACILITY	40CFR 63-KK.829 (b) (1)	38	Recordkeeping requirements
U-00001/00001/050/FLX05	40CFR 63-KK.829 (b) (1)	85	Recordkeeping requirements
U-00001/00001/060/FLX06	40CFR 63-KK.829 (b) (1)	88	Recordkeeping requirements
U-00001/00001/070/FLX07	40CFR 63-KK.829 (b) (1)	91	Recordkeeping requirements
FACILITY	40CFR 63-KK.829 (d)	39	Printing and Publishing NESHAP-Recordkeeping
U-00001	40CFR 63-KK.830 (b) (2)	61	Printing and Publishing NESHAP-Reporting requirements
U-00001	40CFR 63-KK.830 (b) (3)	62	Printing and Publishing NESHAP-Reporting requirements
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	99	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 40, 41	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	15	General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions
FACILITY	6NYCRR 201-6.5 (a) (8)	16	Fees
FACILITY	6NYCRR 201-6.5 (c)	3	General conditions
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

FACILITY	6NYCRR 201-6.5 (c) (3)	23	Permit conditions for Recordkeeping and Reporting of
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Compliance Monitoring Permit conditions for Recordkeeping and Reporting of
FACILITY	6NYCRR 201-6.5 (d) (5)	17	Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance schedules
FACILITY	6NYCRR 201-6.5 (f) (6)	18	Certification
FACILITY	6NYCRR 201-6.5 (g)	24	Off Permit Changes
FACILITY	6NYCRR 201-7	25, 26, 42	Permit shield
U-00001/00001/005/LAMN2	6NYCRR 201-7	69	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-2.1	7	Required emissions tests.
FACILITY	6NYCRR 202-2.5	8, 27	Emission Statements - Applicability
FACILITY	6NYCRR 211.2	100	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 212.6 (a)	28, 29	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 215.2	9	General Process Emission Sources - opacity of emissions limited
U-00002	6NYCRR 226.2	95	Open Fires - Prohibitions
FACILITY	6NYCRR 226.2 (e)	30	General Requirements
U-00002	6NYCRR 226.3 (a)	96	General requirements- 5 year record of solvent consumption
U-00002	6NYCRR 226.4 (a)	97	Equipment specifications- cold cleaning
FACILITY	6NYCRR 227-1.3 (a)	31	Operating Requirements- cold cleaning- drained 15 sec.
FACILITY	6NYCRR 228-1.1 (a)	32	Smoke Emission Limitations.
U-00001	6NYCRR 228-1.10	49	Permit Requirements
U-00001/00001/005/LAMN2	6NYCRR 228-1.10 (a)	72	Handling, storage and disposal of VOCs
U-00001/00001/005/LAMNT	6NYCRR 228-1.10 (a)	78	Open containers- cloth or paper disposal
U-00001/00001/005/LAMN2	6NYCRR 228-1.10 (b)	73	Open containers- spent or fresh VOC
U-00001/00001/005/LAMNT	6NYCRR 228-1.10 (b)	79	Open containers- spent or fresh VOC
U-00001/00001/005/LAMN2	6NYCRR 228-1.10 (c)	74	Post 1/1/2004 Spray equipment clean-up
U-00001/00001/005/LAMNT	6NYCRR 228-1.10 (c)	80	Post 1/1/2004 Spray equipment clean-up
U-	6NYCRR 228-1.10 (d)	75	Open containers-



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

00001/00001/005/LAMN2				storage, dispense of coatings or inks
U-00001/00001/005/LAMNT	6NYCRR 228-1.10 (d)	81		Open containers-storage, dispense of coatings or inks
U-00001/00001/005/LAMN2	6NYCRR 228-1.10 (e)	76		Open containers-store, dispose of coatings, VOCs, solvents
U-00001/00001/005/LAMNT	6NYCRR 228-1.10 (e)	82		Open containers-store, dispose of coatings, VOCs, solvents
U-00001	6NYCRR 228-1.3 (b)	43		VOC incinerator- 80% overall removal efficiency
U-00001 FACILITY	6NYCRR 228-1.3 (c) 6NYCRR 228-1.5	44 33		Solids as applied Reports, recordkeeping, sampling and analysis
U-00001/00001/005/LAMN2	6NYCRR 228-1.5	70		Reports, recordkeeping, sampling and analysis
FACILITY	6NYCRR 228-1.5 (a)	34		VOC recordkeeping by the facility
U-00001	6NYCRR 228-1.5 (d)	45		Department Access to Obtain Samples
U-00001	6NYCRR 228-1.5 (e) (1)	46		Demonstration by directly measuring VOC/solvent recovery
U-00001	6NYCRR 228-1.5 (e) (2)	47		Demonstration of other than VOC solvent recovery
U-00001	6NYCRR 228-1.5 (f)	48		Testing and monitoring; Methods 18, 25 and 25A
U-00001/00001	6NYCRR 228-1.5 (g) (2)	63		Temperature rise across catalytic incinerator bed monitoring
U-00001/00001/005/LAMN2	6NYCRR 228-1.5 (g) (2)	71		Temperature rise across catalytic incinerator bed monitoring
U-00001/00001/005/LAMNT	6NYCRR 228-1.5 (g) (2)	77		Temperature rise across catalytic incinerator bed monitoring
U-00001/00001/005/LAMN2	6NYCRR 231-2	69		New Source Review in Nonattainment Areas and Ozone Transport Region
U-00001	6NYCRR 234.3 (a) (1) (i)	50		Control requirements - Ink
U-00001/00001/OXD/C0OXD	6NYCRR 234.3 (a) (1) (ii) (93		Control requirements - capture and control (installed prior to 7/8/2010)
FACILITY	6NYCRR 234.4 (b)	35		Testing and monitoring - test methods
U-00001/00001/050/FLX05	6NYCRR 234.4 (b)	83		Testing and monitoring - test methods



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

U- 00001/00001/060/FLX06	6NYCRR 234.4 (b)	86	Testing and monitoring - test methods
U- 00001/00001/070/FLX07	6NYCRR 234.4 (b)	89	Testing and monitoring - test methods
U-00001/00001	6NYCRR 234.4 (c)	64	Testing and monitoring - continuous monitoring requirements
U-00001/00001/OXD	6NYCRR 234.4 (c)	92	Testing and monitoring - continuous monitoring requirements
U- 00001/00001/OXD/C0OXD	6NYCRR 234.4 (c)	94	Testing and monitoring - continuous monitoring requirements
U- 00001/00001/050/FLX05	6NYCRR 234.6	84	Handling, storage and disposal of VOCs
U- 00001/00001/060/FLX06	6NYCRR 234.6	87	Handling, storage and disposal of VOCs
U- 00001/00001/070/FLX07	6NYCRR 234.6	90	Handling, storage and disposal of VOCs

Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.5 (a) (4)

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

6 NYCRR 201-6.5 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.5 (a) (8)

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

6 NYCRR 201-6.5 (c)

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

6 NYCRR 201-6.5 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.5 (c) (3)

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.

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

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.5 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.5 (e)

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

6 NYCRR 201-6.5 (f) (6)

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

6 NYCRR 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.

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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 215.2

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

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:

40 CFR 63.6 (b) (2)

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

40 CFR 63.820 (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 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



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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.

40 CFR 63.825 (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.

40 CFR 63.825 (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.

40 CFR 63.825 (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),



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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.

40 CFR 63.825 (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).

40 CFR 63.825 (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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

HAP control efficiency, as determined by paragraphs (d)(1)(i)-(iii) and (d)(1)(x) of section 63.825 for each 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.

40 CFR 63.826 (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.

40 CFR 63.827 (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.



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

40 CFR 63.827 (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 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.

40 CFR 63.828 (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.

40 CFR 63.828 (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.

40 CFR 63.828 (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).



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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.

40 CFR 63.828 (a) (5)

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.

40 CFR 63.828 (a) (5) (iii)

This pertains to Printing and Publishing NESHAP.

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

40 CFR 63.829 (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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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
- (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).

40 CFR 63.829 (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.

40 CFR 63.829 (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.

40 CFR 63.830 (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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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.

40 CFR 63.830 (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.

40 CFR Part 63, Subpart KK

6 NYCRR 212.6 (a)

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

6 NYCRR 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.

6 NYCRR 226.2 (e)

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

6 NYCRR 226.3 (a)



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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.

6 NYCRR 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.

6 NYCRR 227-1.3 (a)

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.

6 NYCRR 228-1.1 (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.

6 NYCRR 228-1.10

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

6 NYCRR 228-1.10 (a)

This citation 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.

6 NYCRR 228-1.10 (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.

6 NYCRR 228-1.10 (c)

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



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

6 NYCRR 228-1.10 (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.

6 NYCRR 228-1.10 (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.

6 NYCRR 228-1.3 (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.

6 NYCRR 228-1.3 (c)

This citation specifies removal efficiency for an air cleaning device used as a control strategy. The air cleaning device must achieve an overall removal efficiency of the lower of 85% removal or the removal determined using the equation specified in 6 NYCRR part 228.3(c).

6 NYCRR 228-1.5

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.

6 NYCRR 228-1.5 (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



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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.

6 NYCRR 228-1.5 (d)

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

6 NYCRR 228-1.5 (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.

6 NYCRR 228-1.5 (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.

6 NYCRR 228-1.5 (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.

6 NYCRR 228-1.5 (g) (2)

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

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

For packaging rotogravure, publication rotogravure or flexographic printing processes



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

that use ink, coating or adhesive containing VOC must use inks that have a VOC content of 0.8 kilograms of VOC per kilogram of solids as applied or 0.16 kilograms of VOC per kilogram of ink, coating or adhesive as applied.

6 NYCRR 234.3 (a) (1) (ii) ('d')

For packaging rotogravure, publication rotogravure, or flexographic printing process that uses ink, coating or adhesive containing VOC shall not operate if it: is located in a severe ozone non-attainment area; has an annual potential to emit VOC of 25 tons per year or more; or is located in a facility that has an annual potential to emit VOC of 50 tons per year or more, unless the printing process uses one of the following strategies to control VOCs.

A capture system and control equipment that provides for overall removal efficiency of at least: 75 percent overall removal efficiency for a printing process that was first installed on or after March 14, 1995, and that is controlled by an add-on capture system and air cleaning equipment that was first installed prior to the effective date of this regulation.

6 NYCRR 234.4 (b)

This regulation sets forth the testing methods and procedures to be used for facilities subject of the requirements of Part 234.

6 NYCRR 234.4 (c)

This regulation specifies that continuous monitoring equipment is required for the following: Combustion zone temperature of all oxidizers; inlet temperature at the catalytic oxidizer bed; break-through of VOC on a carbon adsorption unit; and any other continuous monitoring or recording device required by the Department.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006
Renewal Number: 2
03/24/2011

6 NYCRR 234.6

This regulation specifies the following:

An owner or operator of a facility subject to this Part shall not:

- (a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

6 NYCRR Subpart 201-7

6 NYCRR Subpart 231-2

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

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
U-00001/00001	6 NYCRR Subpart 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region

Reason: Non-Attainment NSR Applicability:

The Ultra Flex Packaging Corporation is currently an existing major



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

facility for VOC. For each regulated NSR contaminant, the project emission potential is determined only for modifications at existing facilities. The project emission potential must consider only the proposed emission increases, and for existing emission sources at a major facility, it is calculated as the difference between the baseline actual emissions and the projected actual emissions of the emission source. Or, for new emission sources, as the sum of the potential to emit of each emission source. The baseline period established for the Ultra Flex Packaging Corporation is November 2005 through October 2007. The baseline period is defined as any 24 consecutive months within the 5 years immediately preceding the date of commencement.

The installation and operation of a new Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 with 2 laminating stations. In order to avoid New Source Review applicability, the facility is choosing to limit the VOC emissions from this new source at 24 tpy.

Installation of one (1) 20,000 cubic feet per minute new Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 with two (2) laminating stations (Emission Source LMIN2). The new laminator is capable of utilizing solvent, solvent-less, and aqueous laminating formulations.

The facility is requesting that the emission limit for this lamination process be capped at 24 tons/year, thus not triggering Part 231-2 (New Source Review) at the Ultra Flex Packaging Corporation results in a "Project Emission Potential" (PEP) of 42.09 TPY. These proposed changes result in a minor modification to emission unit U-00100 only. For the Ultra Flex Packaging Corporation to be subject to New Source Review permitting obligations, this project would need to have a PEP of greater than 25 TPY VOC (the significant project threshold for severe non-attainment areas). The demonstrated PEP (42.09TPY) is less than 25 TPY and is not subject to Part 231.5 NSR permitting.

The proposed project must exceed the significant source project threshold of 25 TPY VOC to trigger NSR program applicability. The calculations summarized below demonstrate that the future potential emissions, less prior actual emissions, are below the NSR program applicability threshold of 25 TPY VOC.

Baseline Actual Emissions:

Baseline Actual Average (November 2005 - October 2007) = Installation and operation of the new laminator = 47.77 TPY of VOC

Projected Actual Emissions are defined as the maximum annual rate, in TPY, at which an existing emission source is projected to emit a regulated NSR contaminant in any one of the five years (12-month period) after a modification. Projected Actual Emissions for sources within the project boundary are presented as follows:

Projected Actual Emissions = 5.68 TPY of VOC after 95% degree of destruction by the RTO



**New York State Department of Environmental Conservation
Permit Review Report**

**Permit ID: 2-6105-00149/00006
Renewal Number: 2
03/24/2011**

Major Nonattainment NSR Applicability Calculation:

Project Emission Potential = Projected Actual Emissions - Baseline
Actual Emissions =
47.77 - 5.68 =
42.09 tpy of VOC

Since the demonstrated PEP (42.09 TPY) is more than the NSR program applicability threshold of 25 TPY of VOC, therefore; the project is subject to Part 231.5 NSR permitting. But, the facility is choosing to cap the VOC emissions at 24 tpy of VOC, which is less than the threshold of 25 tpy. Therefore, the project is not subject to NSR or Part 231-2.

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	Cond No.	Type of Monitoring
U-00001/00001	66	monitoring of process or control device parameters as surrogate
FACILITY	37	record keeping/maintenance procedures
U-00001	54	monitoring of process or control device parameters as surrogate
U-00001	56	monitoring of process or control device parameters as surrogate
U-00001	57	monitoring of process or control device parameters as surrogate
U-00001	59	monitoring of process or control device parameters as surrogate
U-00001	60	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
U-00001/00001/050/FLX05	85	record keeping/maintenance procedures
U-00001/00001/060/FLX06	88	record keeping/maintenance procedures
U-00001/00001/070/FLX07	91	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	work practice involving specific operations



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006
Renewal Number: 2
03/24/2011

FACILITY	26	work practice involving specific operations
U-00001/00001/005/LAMN2	69	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	record keeping/maintenance procedures
U-00002	95	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
U-00002	96	record keeping/maintenance procedures
U-00002	97	record keeping/maintenance procedures
FACILITY	31	monitoring of process or control device parameters as surrogate
U-00001	49	record keeping/maintenance procedures
U-00001/00001/005/LAMN2	72	record keeping/maintenance procedures
U-00001/00001/005/LAMNT	78	record keeping/maintenance procedures
U-00001/00001/005/LAMN2	73	record keeping/maintenance procedures
U-00001/00001/005/LAMNT	79	record keeping/maintenance procedures
U-00001/00001/005/LAMN2	74	record keeping/maintenance procedures
U-00001/00001/005/LAMNT	80	record keeping/maintenance procedures
U-00001/00001/005/LAMN2	75	record keeping/maintenance procedures
U-00001/00001/005/LAMNT	81	record keeping/maintenance procedures
U-00001/00001/005/LAMN2	76	record keeping/maintenance procedures
U-00001/00001/005/LAMNT	82	record keeping/maintenance procedures
U-00001	43	intermittent emission testing
FACILITY	33	record keeping/maintenance procedures
U-00001/00001/005/LAMN2	70	work practice involving specific operations
FACILITY	34	record keeping/maintenance procedures
U-00001	48	record keeping/maintenance procedures
U-00001/00001	63	monitoring of process or control device parameters as surrogate
U-00001/00001/005/LAMN2	71	monitoring of process or control device parameters as surrogate
U-00001/00001/005/LAMNT	77	monitoring of process or control device parameters as surrogate
U-00001	50	monitoring of process or control device parameters as surrogate
U-00001/00001/OXD/COOXD	93	monitoring of process or control device parameters as surrogate
FACILITY	35	record keeping/maintenance procedures
U-00001/00001/050/FLX05	83	record keeping/maintenance procedures
U-00001/00001/060/FLX06	86	record keeping/maintenance procedures
U-00001/00001/070/FLX07	89	record keeping/maintenance procedures
U-00001/00001	64	monitoring of process or control device parameters as surrogate
U-00001/00001/OXD	92	continuous emission monitoring (cem)
U-00001/00001/OXD/COOXD	94	continuous emission monitoring (cem)
U-00001/00001/050/FLX05	84	record keeping/maintenance procedures
U-00001/00001/060/FLX06	87	record keeping/maintenance procedures
U-00001/00001/070/FLX07	90	record keeping/maintenance procedures

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 #26 for 6 NYCRR 201-7, Capping out of 40 CFR Part 63, Subpart KK: This is a facility-wide condition. This requirement pertains to NESHAP (National Emission Standard for the Printing and Publishing Industry) - applicability of MACT (section 63 NESHAPS).



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

The facility is required to demonstrate that the facility's emissions are 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 by maintaining records of all required measurements and emission calculations of any individual HAP and total HAPs from all activities at the facility. Records must be maintained at the facility for a period of five (5) years. This facility is a major source of VOC, but a minor source of HAPs.

Condition #27 for 6 NYCRR 201-7, Capping out of 40 CFR Part 63, Subpart KK: This is a facility-wide condition. This requirement pertains to NESHAP (National Emission Standard for the Printing and Publishing Industry) - applicability of MACT (section 63 NESHAPS).

The facility is required to demonstrate that the facility's emissions are 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 by maintaining records of all required measurements and emission calculations of any individual HAP and total HAPs from all activities at the facility. Records must be maintained at the facility for a period of five (5) years. This facility is a major source of VOC, but a minor source of HAPs.

Condition #29 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 #32 for 6 NYCRR 227-1.3 (a): This is a facility-wide condition. 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.

Condition #44 for 6 NYCRR 228-1.3(b): This condition is an emission unit level condition for EU: U-00001 for Intermittent Emission Testing of 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 # 51 for 6 NYCRR 234.3(a)(1)(i): This condition is an emission unit level condition for EU: U-00001 for Monitoring of Process or Control Device Parameters as Surrogate of VOC for 60 percent overall reduction. For packaging rotogravure, publication rotogravure or flexographic printing processes that use ink, coating or adhesive containing VOC must use inks that have a VOC content of 0.8 kilograms of VOC per kilogram of solids as applied or 0.16 kilograms of VOC per kilogram of ink, coating or adhesive as applied.

Condition # 55 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 of the destruction efficiency of 95 percent reduction by weight. 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.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

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 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 #57 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 # 58 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 (National Emission Standard for the Printing and Publishing Industry) - 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 #60 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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

Surrogate for the pressure change. This pressure change cannot fall below -0.007 inches of water and has to be monitored continuously.

This requirement pertains to Printing and Publishing NESHAP (National Emission Standard for the Printing and Publishing Industry) - monitoring requirements. The facility is required to monitor operating pressure differential across enclosure to ensure 100% capture efficiency of collecting organic HAP emissions into a closed-vent system that exhausts to the RTO.

Condition # 64 for 6 NYCRR 228-1.5(g)(2): This condition is an emission unit level condition for EU: U-00001 for VOC for Monitoring of Process or Control Device Parameters as Surrogate for the temperature. This temperature cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously.

This condition requires the facility to continuously monitor the temperature of the combustion chamber of the oxidizer. This requires the facility to continuously monitor and measure the temperature rise across catalytic incinerator bed when an air cleaning device is used.

Condition #65 for 6 NYCRR 234.4 (c): This condition is an emission unit level condition for EU: U-00001 for VOC for Monitoring of Process or Control Device Parameters as Surrogate for the temperature. This temperature cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously.

The minimum combustion chamber temperature shall be 1500 degrees Fahrenheit. The temperature of the oxidizer that is used to comply at all times that the oxidizer is operating.

This condition specifies that continuous monitoring equipment is required for the following: Combustion zone temperature of all oxidizers; inlet temperature at the catalytic oxidizer bed; break-through of VOC on a carbon adsorption unit; and any other continuous monitoring or recording device required by the Department.

Condition # 67 for 40 CFR 63.825(d)(1), 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. This temperature cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously.

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

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 #70 for 6 NYCRR 201-7, Capping out of 6 NYCRR 231-2: This condition is an emission unit, emission point, process and emission source level condition for EU: U-00001, EP: 00001, Proc: 005 and Emission Source: LAMN2 for VOC for Work Practice Involving Specific Operations for the parameter of the process material, which is inks, solvents and adhesives and it is not to exceed 24 tons per year in order not to trigger New Source Review (6 NYCRR 231-2) when the facility added the new laminator (Emission Source LAMN2).



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

The facility is required 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 consecutive 12-month period, on a monthly basis. Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating purchased/used at the facility, must be maintained and, upon request, be submitted to the Department. Records must be maintained at the facility for a period of five (5) years.

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

Condition # 71 for 6 NYCRR 228-1.5: This condition is an emission unit, emission point, process and emission source level condition for EU: U-00001, EP: 00001, Proc: 005 and Emission Source: LAMN2 for VOC for Work Practice Involving Specific Operations for the parameter of the process material, which is inks, solvents and adhesives and it is not to exceed 24 tons per year.

The facility is required 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 consecutive 12-month period, on a monthly basis. Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating purchased/used at the facility, must be maintained and, upon request, be submitted to the Department. Records must be maintained at the facility for a period of five (5) years.

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 #72 for 6 NYCRR 228-1.5(g)(2): This condition is an emission unit, emission point, process and emission source level condition for EU: U-00001, EP: 00001, Proc: 005 and Emission Source: LAMN2 for VOC for Monitoring of Process or Control Device Parameters as Surrogate for the temperature. This temperature cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously.

This condition requires continuous monitors measure the temperature rise across catalytic incinerator bed when an air cleaning device is used. The temperature of the combustion chamber of the oxidizer cannot fall below 1500 degrees Fahrenheit.

Condition # 78 for 6 NYCRR 228-1.5(g)(2): This condition is an emission unit, emission point, process and emission source level condition for EU: U-00001, EP: 00001, Proc: 005 and Emission Source: LAMNT for VOC for Monitoring of Process or Control Device Parameters as Surrogate for the temperature. This temperature cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

This condition requires continuous monitors measure the temperature rise across catalytic incinerator bed when an air cleaning device is used. The temperature of the combustion chamber of the oxidizer cannot fall below 1500 degrees Fahrenheit.

Condition # 93 for 6 NYCRR 234.4(c): This condition is an emission unit, emission point and process level condition for EU: U-00001, EP: 00001 and Proc: OXD for VOC for Continuous Emission Monitoring (CEM) for the temperature. This temperature cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously.

The minimum combustion chamber temperature shall be 1500 degrees Fahrenheit. The temperature of the oxidizer that is used to comply at all times that the oxidizer is operating. Automated and charted combustion chamber temperature readings. The facility is required to continuously record combustion chamber temperature. The Test Reference Method should be according to the manufacturer's specifications that is in the RTO's operating manual.

This condition specifies that continuous monitoring equipment is required for the following: Combustion zone temperature of all oxidizers; inlet temperature at the catalytic oxidizer bed; breakthrough of VOC on a carbon adsorption unit; and any other continuous monitoring or recording device required by the Department.

Condition # 94 for 6 NYCRR 234.3(a)(1)(ii)('d'): This condition is an emission unit, emission point and process level condition for EU: U-00001, EP: 00001, Proc: OXD and Emission Source: C0OXD for VOC for Monitoring of Process or Control Device Parameters as Surrogate for the temperature. This temperature cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously.

Any time that any of the flexographic printing presses is operating, the Regenerative Thermal Oxidizer (RTO) must be started and allowed to reach operating temperature (minimum of 1500 degrees Fahrenheit) prior to starting the presses. According to the manufacturer's Operation and Maintenance Manual for the RTO, if the presses are started before the RTO is at operating temperature, the solvent laden air from the printing operation will be automatically aborted to the atmosphere until the oxidizer attains operating temperature and comes on line.

The temperature in the RTO (a minimum inlet temperature of 1500 degrees Fahrenheit) must be continuously monitored and calibrated according to the manufacturer's instructions and must be operated at all times that the RTO is operated which is whenever any of the printing presses are operating.

The facility shall comply with 6 NYCRR 200.7 which requires the emission control device, the RTO, to be kept in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

For packaging rotogravure, publication rotogravure, or flexographic printing process that uses ink, coating or adhesive containing VOC shall not operate if it: is located in a severe ozone non-attainment area; has an annual potential to emit VOC of 25 tons per year or more; or is located in a facility that has an annual potential to emit VOC of 50 tons per year or more, unless the printing process uses one of the following strategies to control VOCs.

A capture system and control equipment that provides for overall removal efficiency of at least: 75 percent overall removal efficiency for a printing process that was first installed on or after March 14,1995, and



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 2-6105-00149/00006

Renewal Number: 2

03/24/2011

that is controlled by an add-on capture system and air cleaning equipment that was first installed prior to the effective date of this regulation.

Condition #95 for 6 NYCRR 234.4(c): This condition is an emission unit, emission point and process level condition for EU: U-00001, EP: 00001, Proc: OXD and Emission Source: COOXD for VOC for Continuous Emission Monitoring (CEM) for the temperature. This temperature cannot fall below 1500 degrees Fahrenheit and has to be monitored continuously.

The minimum combustion chamber temperature shall be 1500 degrees Fahrenheit. The temperature of the oxidizer that is used to comply at all times that the oxidizer is operating. Automated and charted regenerative thermal oxidizer (RTO) combustion chamber temperature readings. The continuous monitor shall be installed and periodically calibrated according to the manufacturer's instructions, and shall be operated at all times that the RTO is operating.

This condition specifies that continuous monitoring equipment is required for the following: Combustion zone temperature of all oxidizers; inlet temperature at the catalytic oxidizer bed; break-through of VOC on a carbon adsorption unit; and any other continuous monitoring or recording device required by the Department.