



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

**Permit ID: 2-6105-00149/00006**

**Renewal Number: 3**

**07/25/2016**

**Facility Identification Data**

Name: TRANSCONTINENTAL ULTRA FLEX INC.

Address: 975 ESSEX ST

BROOKLYN, NY 11208-5419

**Owner/Firm**

Name: TRANSCONTINENTAL ULTRA FLEX INC

Address: Christine Desaulniers

975 ESSEX ST

BROOKLYN, NY 11208, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

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975 ESSEX ST

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**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**

This is a Title V permit Renewal # 3 application for Transcontinental Ultra Flex Inc. Currently, the facility has a Title V permit that was modified on 11/5/2013 and is due to expire on 3/14/2016. The facility



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operates VOC emissions that are processed through the RTO with a destruction efficiency of > 95%. The facility is a minor source of HAPs; however, the facility is a major source of VOC. 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 destructive efficiency greater than 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 #3 application involves the reconfiguration of equipment under existing Emission Unit U-00001 and the addition of Emission Unit U-00003, both units to account for the installation and operation of one (1) new Nordmeccanica Tandem Duplex Combi Linear Laminator (Emission Source LMN03) in Emission Unit U-00003 and one (1) new Allstein 10-color printing press (Emission Source FLX08) in Emission Unit U-00001. The new Nordmeccanica Tandem Duplex Combi Linear Laminator (Emission Source LMN03) is ducted to one (1) new 40,000 CFM Regenerative Thermal Oxidizer (RTO), (Emission Source/Control P2OXD2/C2OXD2) for control of the VOC. And the new Allstein 10-color printing press (Emission Source FLX08) is ducted to the existing 40,000 CFM natural gas fired regenerative thermal oxidizer (Emission Source/Control P0OXD/C0OXD) for control of the VOC.

The facility consists of the following three emission units:

Emission Unit U-00001 will represent the operation of all existing Printing Press Equipment (FLX05, FLX06 & FLX07) with the addition of a new Printing Press (FLX08), all ducted to the existing Regenerative Thermal Oxidizer (P0OXD/C0OXD). Its corresponding emission point is Emission Point 00001, and its corresponding processes are Processes 050, 060, 070, 080 and OXD.

Emission Unit U-00002 will remain unchanged, consisting 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 U-00003 will represent the operation of all existing Laminating Equipment (LMN01 & LMN02) with the addition of a new Laminator (LMN03), all ducted to a new Regenerative Thermal Oxidizer (P2OXD2/C2OXD2). Its corresponding emission point is Emission Point 00003, and its corresponding processes are Processes LAM and OXZ.

In order to avoid New Source Review applicability, the facility is proposing to limit the combined VOC emissions from the new sources (FLX08 and LAMN3) at 24 tons/year, which is below the 25 tpy threshold, and therefore; this addition is not subject to New Source Review or Part 231-2.2.

**Hazardous Air Pollutants (HAPs):**

HAP Emissions since the last permit renewal are insignificant. Facility NESHAP compliance is met by exemption as no Individual HAP exceeds 10 TPY emissions and Combined Total HAP emissions are less than 25 TPY.

**Existing Permit Renewal #2, Modification #1:**

Significant equipment currently permitted under this renewal are as follows:

three (3) 10-color Flexographic Printing Presses (Emission Sources FLX05, FLX06 & FLX07)

Two (2) Laminators (Emission Sources LMN01 & LMN02)

One (1) Regenerative Thermal Oxidizer (RTO)- Emission Source/Control (P0OXD/C0OXD)

One (1) Automated parts washing system (Emission Source RENZM)



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Permit Renewal #3:

Significant equipment to be added under this renewal are as follows:

One (1) new Laminator - Nordmeccanica Tandem Duplex Combi Linear Laminator (Emission Source LMN03)

One (1) new Printing Press - Allstein 10-Color Printing Press (Emission Source FLX08)

One (1) new Regenerative Thermal Oxidizer (RTO) - (Emission Source/Control P2OXD/C2OXD)

Additional equipment designated as trivial and/or exempt at the facility includes:

(10) Natural gas fired unit heaters (each unit < 10 MM Btu/hr)

(3) Natural gas fired compressor engines (< 200 Hp)

(3) Natural gas fired cogeneration units (< 200 Hp)

(1) Non-contact cooling tower

(1) Storage tank (< 10,000 gallons)

(1) Exhaust system for paint mixing

(1) Exhaust system for solvent transfer

The emissions summary for the years 2011 through 2014 show that permitting is driven by the production-related printing operations and subsequent emissions of VOCs. Overall, actual facility VOC emissions have remained relatively constant over the last term at approximately 50 TPY.

**Attainment Status**

TRANSCONTINENTAL ULTRA FLEX INC. 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
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:**

Transcontinental Ultra Flex Inc is located at 975 Essex Street in Brooklyn, New York. Ultra Flex operates four 10-color flexographic printing presses (Emission Sources FLX05, FLX06, FLX07 & FLX08) and three laminators (Emission Sources LMN01, LMN02 & LMN03) ducted to two Regenerative Thermal Oxidizers (RTOs) to produce flexible packaging materials. The facility creates VOC emissions that are ducted and processed through two natural gas fired regenerative thermal oxidizers with a destruction efficiency of 95% before emitting to the environment. The VOC emissions from the four printing presses in Emission Unit U-



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00001 are directed and ducted to one RTO (Emission Source/Control (P0OXD/C0OXD), and the VOC emissions from the three laminators are directed and ducted to the other RTO (Emission Source/Control (P2OXD2/C2OXD2) for the > 95% destruction of the VOC. The Industrial Classification Code (SIC) for this facility is 2759 - Commercial Flexographic Printing.

This is a Title V permit Renewal # 3 application for Transcontinental Ultra Flex Inc. Currently, the facility has a Title V permit that was modified on 11/5/2013 and is due to expire on 3/14/2016. The facility operates VOC emissions that are processed through the RTO with a destruction efficiency of > 95%. The facility is a minor source of HAPs; however, the facility is a major source of VOC. The facility operates four 10-color flexographic printing presses and three laminators, their VOC emissions are ducted to two Regenerative Thermal Oxidizers (RTOs) to produce flexible packaging materials. The facility creates VOC emissions that are processed through natural gas fired regenerative thermal oxidizers with a destructive efficiency greater than 95% before emitting to the environment.

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). The Title V renewal #3 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.

This Title V Permit Renewal #3 application involves the reconfiguration of equipment under existing Emission Unit U-00001 and the addition of Emission Unit U-00003, both units to account for the installation and operation of one (1) new Nordmeccanica Tandem Duplex Combi Linear Laminator (Emission Source LAMN3) and one (1) new Allstein 10-color printing press (Emission Source FLX08), each ducted to one (1) new 45,000 CFM Regenerative Thermal Oxidizer (RTO), (Emission Source/Control P2OXD2/C2OXD2).

The facility consists of the following three emission units:

Emission Unit U-00001 represents the operation of all existing Printing Press Equipment (FLX05, FLX06 & FLX07) with the addition of a new Printing Press (FLX08), their VOC emissions are all ducted to the existing Regenerative Thermal Oxidizer (P0OXD/C0OXD).

Emission Unit U-00002 remains unchanged, consisting 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 U-00003 represents the operation of all existing Laminating Equipment (LAMN1 & LAMN2) with the addition of a new Laminator (LAMN3), all ducted to a new Regenerative Thermal Oxidizer (P2OXD2/C2OXD2).

In order to avoid New Source Review applicability (6 NYCRR 231-2) evaluation in non-attainment areas and ozone transport regions for the installation and operation of the new printing press (Emission Source FLX08) and the new laminator (Emission Source LMN03), the facility is proposing to limit the combined VOC emissions from the new sources (FLX08 and LAMN3) at 24 tons/year, which is below the 25 tpy threshold, and therefore; this addition is not subject to New Source Review or Part 231-2.2. The new laminator is capable of utilizing solvent, solvent-less, and aqueous laminating formulations.



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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 operates two RTOs (Regenerative Thermal Oxidizers) with a minimum inlet temperature of 1500 degrees Fahrenheit, and with a minimum VOC destruction efficiency of 95%. The Title V renewal #3 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 operates several permitted sources under this renewal, they are as follows:

Four (4) 10-color Flexographic Printing Presses (Emission Sources FLX05, FLX06, FLX07 & FLX08), three are Fischer & Krecke flexographic printing presses (Emission Sources FLX05, FLX06 & FLX07), and one is Allstein flexographic printing press (Emission Sources FLX08).

Three (3) Laminators (Emission Sources LMN01, LMN02 & LMN03) - 20,000 cubic feet per minute Nordmeccanica Duplex Combi linear laminator (Emission Source LMN01), 20,000 cubic feet per minute Nordmeccanica Triplex Combi Verticale Laminator, Model L1500) - Emission source LMN02, and 40,000 cubic feet per minute Nordmeccanica Tandem Duplex Combi Linear Laminator (Emission Source LMN03). Two (2) Regenerative Thermal Oxidizers (RTOs)- Emission Source/Control (P0OXD/C0OXD) and (Emission Source/Control P2OXD/C2OXD) - 40,000 cubic feet per minute Anguil Regenerative Thermal Oxidizer Model 400.

One (1) Automated parts washing system (Emission Source RENZM) - 4 pounds per hour Renzmann Parts Washer System, Model 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 (< 200 Hp)
- (3) Natural gas fired cogeneration units (< 200 Hp)
- (1) Non-contact cooling tower
- (1) Storage tank (< 10,000 gallons)
- (1) Exhaust system for paint mixing
- (1) Exhaust system for solvent transfer

**Permit Structure and Description of Operations**

The Title V permit for TRANSCONTINENTAL ULTRA FLEX INC.

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:  
combustion - devices which burn fuel to generate heat, steam or power  
incinerator - devices which burn waste material for disposal



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control - emission control devices  
process - any device or contrivance which may emit air contaminants  
that is not included in the above categories.

TRANSCONTINENTAL ULTRA FLEX INC. is defined by the following emission unit(s):

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.

Emission unit U00001 - Emission Unit U-00001 consists of four (4) flexographic printing presses, three (3) are Fischer & Krecke flexographic printing presses (Emission Sources FLX05, FLX06 & FLX07), and one (1) new Allstein flexographic printing press (Emission Source FLX08). The emissions from the four printing presses are vented to Emission point 00001 and then ducted to an existing natural gas fired regenerative thermal oxidizer (Emission Source/Control P00XD/C00XD) for control of the VOC. Process 050 is the operation of Flexographic Printing Press # 5 (Emission Source FLX05), Process 060 is the operation of Flexographic Printing Press # 6 (Emission Source FLX06, Process 070 is the operation of Flexographic Printing Press # 7 (Emission Source FLX07, and Process 080 is the operation of Flexographic Printing Press # 8 (Emission Source FLX08, and Process OXD is for the operation of the regenerative thermal oxidizer (RTO). 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.

Emission unit U-00001 consists of the following four (4) flexographic printing presses:

Emission Source FLX05 - 12,000 cubic feet per minute Fischer & Krecke, Flexpress 16S-10 (10-color printing press # 5),

Emission Source FLX06 - 12,000 cubic feet per minute Fischer & Krecke, Flexpress 16S-10, (10-color printing press # 6),

Emission Source FLX07 - 12,000 cubic feet per minute Fischer & Krecke, Flexpress 16S-10, (10-color printing press # 7) and

Emission Source FLX08 - 12,000 cubic feet per minute Allstein (10-color printing press # 8)

Emission unit U-00001 consists of the following Emission Source/Control for the RTO:

Emission Source P00XD - Anguil RTO (Regenerative Thermal Oxidizer), Model 400

Emission Control C00XD - Direct Flame Afterburner With Heat Exchanger for the Anguil RTO (Regenerative Thermal Oxidizer) Model 400

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.



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

Process: 050 is located at 1, Building MAIN - Process 050 is the operation of Flexographic Printing Press # 5 (Emission Source FLX05), which is a Fischer & Krecke, Flexpress 16S-10 (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 Flexpress 16S-10 (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 Flexpress 16S-10 (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: 080 Process 080 is the operation of Flexographic Printing Press # 8 (Emission Source FLX08), which is an Allstein 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 FLX08 will be designated as Press # 4.

Process: OXD is located at TOP OF ROOF, Building MAIN - Process OXD is the venting of VOC emissions from the four flexographic printing presses (Emission Sources FLX05, FLX06, FLX07 & FLX08) to a Regenerative Thermal Oxidizer (RTO) for control of VOC emissions. VOC destruction efficiency is 95%. Its corresponding emission point is Emission Point 00001, its corresponding emission unit is Emission Unit U-00001 and its corresponding Emission Source/Control is P0OXD/C0OXD for the regenerative thermal oxidizer.

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

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



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VOC destruction required: 95%.

Emission unit U00003 - Emission Unit U-00003 consists of three laminators (Emission Sources LMN01, LMN02 & LMN03). The new laminator is a 20,000 cubic feet per minute Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 (Emission Source LMN03). The emissions from the three laminators are vented to Emission Point 00003 and then ducted to a new natural gas fired Regenerative Thermal Oxidizer (Emission Source P2OXD/Emission Control C2OXD) for control of the VOC. Process LAM is the lamination process of the three (3) laminators (Emission Sources LMN01, LMN02 & LMN03), in which their emissions vent through a regenerative thermal oxidizer (Emission Source/Control P0OXD/C0OXD). Process OXZ is for the operation of the regenerative thermal oxidizer (Emission Source P2OXD/Emission Control C2OXD).

The three laminators are as follow:

Laminator LMN01 is a 20,000 cubic feet per minute Nordmeccanica Duplex Combi linear laminator, Model 1500 (59")

Laminator LMN02 is a 20,000 cubic feet per minute Nordmeccanica Triplex Combi Verticale Laminator, Model L1500, and

Laminator LMN03 is a 4,000 cubic feet per minute new Nordmeccanica Tandem Duplex Combi linear laminator.

The new regenerative thermal oxidizer is a 45,000 cubic feet per minute

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

00003

Process: LAM is located at FIRST FLOOR, Building MAIN - Process LAM is the lamination process of the three (3) laminators (Emission Sources LMN01, LMN02 & LMN03), in which their emissions vent through a regenerative thermal oxidizer (Emission Source/Control P0OXD/C0OXD) for control of the VOC. The three laminators include the Nordmeccanica Duplex Combi linear laminator, Model 1500, 59" (Emission Source LMN01), the Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 (Emission Source LMN02), and the new Nordmeccanica Tandem Duplex Combi linear laminator (Emission Source LMN03), their corresponding emission point is Emission point 00003, and their corresponding emission unit is Emission Unit U-00003. VOC destruction efficiency is 95%.

The three laminators are as follow:

Laminator LMN01 is a 20,000 cubic feet per minute Nordmeccanica Duplex Combi linear laminator, Model 1500 (59")

Laminator LMN02 is a 20,000 cubic feet per minute Nordmeccanica Triplex Combi Verticale Laminator, Model L1500 with 2 laminating stations, and



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Laminator LMN03 is a 4,000 cubic feet per minute new Nordmeccanica Tandem Duplex Combi linear laminator.

The emissions from the three laminators are vented to Emission Point 00003 and then ducted to a new natural gas fired Regenerative Thermal Oxidizer (Emission Source P2OXD/Emission Control C2OXD) for control of the VOC.

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%.

Process: LM3 is located at FIRST FLOOR, Building MAIN - Process LM3 is the lamination process of the new laminator (Emission Source LMN03), in which its emissions vent through a regenerative thermal oxidizer (Emission Source/Control P0OXD/C0OXD) for control of the VOC. The new laminator is a Nordmeccanica Tandem Duplex Combi linear laminator (Emission Source LMN03), its corresponding emission point is Emission point 00003, and its corresponding emission unit is Emission Unit U-00003. VOC destruction efficiency is 95%.

The specification of the new laminator (Emission Source LMN03) is as follows:  
Laminator LMN03 is a 4,000 cubic feet per minute new Nordmeccanica Tandem Duplex Combi linear laminator.

The emissions from the new laminator (Emission Source LMN03) are vented to Emission Point 00003 and then ducted to a new natural gas fired Megtech Regenerative Thermal Oxidizer (Emission Source P2OXD/Emission Control C2OXD) for control of the VOC.

The following information was obtained through Megtech, 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",  
Burner installed capacity: 10.3 MM Btu/hr,  
Expected burner usage: 0.6 - 4.8 MM Btu/hr,



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VOC destruction required: 95%.

Process: OXZ is located at TOP OF ROOF, Building MAIN - Process OXZ is the venting of VOC emissions from the three laminators (Emission Sources LMN01, LMN02 & LMN03) to a Regenerative Thermal Oxidizer (RTO) for control of VOC emissions. VOC destruction efficiency is 95%. Its corresponding Emission Source/Control is P2OXD/C2OXD for the regenerative thermal oxidizer. VOC destruction is expected to be a minimum of 95%.

The emissions from the three laminators are vented to Emission Point 00003 and then ducted to a new natural gas fired Regenerative Thermal Oxidizer (Emission Source P2OXD/Emission Control C2OXD) for control of the VOC.

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%.

**Title V/Major Source Status**

TRANSCONTINENTAL ULTRA FLEX INC. 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 TRANSCONTINENTAL ULTRA FLEX INC. with regards to the principal air pollution regulatory programs:

**Regulatory Program**

**Applicability**



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

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**NOTES:**

**PSD** Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - 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 231-5, 231-6) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

**Title VI** Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - 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.



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

**SIP** State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - 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	COMMERCIAL PRINTING, NEC
7399	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
4-05-005-11	PRINTING - FLOXOGRAPHIC 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



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true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount 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	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
000100-41-4	ETHYLBENZENE		> 0 but < 10 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
0NY100-00-0	TOTAL HAP		>= 10 tpy but < 25 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, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;
  - (3) During the period of the emergency the facility owner or



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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 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 or operator seeking to establish the occurrence of an emergency has the burden of proof.

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

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

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

**Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(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 201-6.2(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 201-6.4(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 201-6.4(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**



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**201-6.4(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 201-6.4(a)(6)**

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

**Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)**

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

**Item J: Permit Shield - 6 NYCRR Part 201-6.4(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 201-6.4(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.



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

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

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

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

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

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

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

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

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such



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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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
FACILITY	ECL 19-0301	124	Powers and Duties of the Department with respect to air pollution control
U- 00001/00001/080/FLX08	40CFR 63-A.6(b)(2)	105	Compliance dates for new and reconstructed sources
FACILITY	40CFR 63-KK	67	Printing and Publishing NESHAP
FACILITY	40CFR 63-KK.820(a)	68, 69	Printing and Publishing NESHAP-applicability
U- 00001/00001/050/FLX05	40CFR 63-KK.825(b)(7)	88	Printing and Publishing NESHAP-standard: product and packaging rotogravure and wide-web flexographic printing
FACILITY	40CFR 63-KK.825(d)(1)	70, 71	Printing and Publishing NESHAP-demonstration of compliance with overall organic HAP control efficiency
FACILITY	40CFR 63-KK.825(e)	72	Printing and Publishing NESHAP-standard: product and packing rotogravure and wide-web flexographic printing
U- 00001/00001/OXD/FLX05	40CFR 63-KK.825(f)(3)	108	Standards: Product and packaging rotogravure and wide-web flexographic printing
U- 00001/00001/050/FLX05	40CFR 63-KK.825(h)(3)	89	Standards: Product and packaging rotogravure and wide-web flexographic printing
U- 00001/00001/050/FLX05	40CFR 63-KK.826(a)	90	Printing and Publishing NESHAP-compliance dates
U-	40CFR 63-KK.827(d)	109	Printing and



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00001/00001/OXD/FLX05			Publishing NESHAP-performance test methods
U-00001/00001/050/FLX05	40CFR 63-KK.827(e)(1)	91	Performance test methods
U-00001/00001/OXD/FLX05	40CFR 63-KK.828(a)(2)(i)	110	Monitoring requirements
FACILITY	40CFR 63-KK.828(a)(4)(i)	73, 74	Monitoring Requirements for Oxidizers (not catalytic)
FACILITY	40CFR 63-KK.828(a)(4)(i)	75, 76	Monitoring requirements
U-00001/00001/050/FLX05	40CFR 63-KK.828(a)(5)	92	Monitoring requirements
FACILITY	40CFR 63-KK.828(a)(5)(i)	77, 78	Monitoring requirements
U-00001/00001/050/FLX05	40CFR 63-KK.829(b)	93	Printing and Publishing NESHAP-Recordkeeping
FACILITY	40CFR 63-KK.829(b)(1)	79	Recordkeeping requirements
FACILITY	40CFR 63-KK.829(d)	80	Printing and Publishing NESHAP-Recordkeeping
U-00001/00001/050/FLX05	40CFR 63-KK.830(b)(1)	94	Printing and Publishing NESHAP-Reporting
U-00001/00001/060/FLX06	40CFR 63-KK.830(b)(1)	99	Reporting requirements
U-00001/00001/070/FLX07	40CFR 63-KK.830(b)(1)	102	Printing and Publishing NESHAP-Reporting
U-00001/00001/080/FLX08	40CFR 63-KK.830(b)(1)	106	Reporting requirements
U-00001/00001/050/FLX05	40CFR 63-KK.830(b)(2)	95	Printing and Publishing NESHAP-Reporting
U-00001/00001/050/FLX05	40CFR 63-KK.830(b)(3)	96	Reporting requirements
FACILITY	40CFR 68	19	Printing and Publishing NESHAP-Reporting requirements
FACILITY	40CFR 82-F	20	Chemical accident prevention provisions
FACILITY	6NYCRR 200.6	1	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.7	10	Acceptable ambient air quality.
FACILITY	6NYCRR 201-1.4	125	Maintenance of equipment.
FACILITY	6NYCRR 201-1.7	11	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.8	12	Recycling and Salvage
			Prohibition of



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				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	21, 81, 82		Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15		General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2		General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16		General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3		Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4		Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5		Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22		Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6		Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17		Off Permit Changes
FACILITY	6NYCRR 201-6.4(g)	23		Permit Shield
FACILITY	6NYCRR 201-7	83		Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18		Required emissions tests.
FACILITY	6NYCRR 202-2.1	7		Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8, 27		Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	28		General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	126		General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212.6(a)	29		General Process Emission Sources - opacity of emissions limited
U-00003/00003/LAM/LMN01	6NYCRR 212-1.4(1)(1)	115		Part 228-1 process emission sources with respect to A-rated VOC contaminants
U-00003/00003/LAM/LMN01	6NYCRR 212-1.4(1)(3)	116		Part 228-2 process emission sources with respect to A-rated VOC contaminants
U-00001/00001/050/FLX05	6NYCRR 212-1.4(p)	85		Part 234 process emission sources with respect to A-rated



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U-00001/00001 FACILITY	6NYCRR 212-1.6(a) 6NYCRR 215.2	84 9	VOC contaminants Limiting of Opacity Open Fires - Prohibitions General Requirements
U- 00002/00002/010/RENZM FACILITY	6NYCRR 226.2 6NYCRR 226.2(e)	111 30	General requirements- 5 year record of solvent consumption Equipment specifications- cold cleaning Operating Requirements- cold cleaning- drained 15 sec.
U- 00002/00002/010/RENZM	6NYCRR 226.3(a)	112	
U- 00002/00002/010/RENZM	6NYCRR 226.4(a)	113	Requirements- cold cleaning- drained 15 sec.
FACILITY	6NYCRR 227-1.3(a)	31	Smoke Emission Limitations.
FACILITY	6NYCRR 228-1.1(a)	32	Applicability
FACILITY	6NYCRR 228-1.10	52	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 228-1.3(a)	33	Surface Coating General Requirements- Opacity
FACILITY	6NYCRR 228-1.3(b)	34, 35	Surface Coating General Requirements- Recordkeeping
FACILITY	6NYCRR 228-1.3(b)(1)	36, 37	General Requirements - Record Keeping
U- 00003/00003/LAM/LMN01 FACILITY	6NYCRR 228-1.3(b)(1) 6NYCRR 228-1.3(c)	117 38, 39	General Requirements - Record Keeping Surface Coating General Requirements- Prohibitions
FACILITY	6NYCRR 228-1.3(d)	40, 41	Surface Coating General Requirements- Handling, storage and disposal
U- 00003/00003/LAM/C2OXD	6NYCRR 228-1.3(d)	114	Surface Coating General Requirements- Handling, storage and disposal
FACILITY	6NYCRR 228-1.4(d)(1)	42	Class D coating line emission control
U- 00003/00003/LAM/LMN02	6NYCRR 228-1.5	121	Controlling VOC Emissions Using Add- On Controls or Coating Systems
FACILITY	6NYCRR 228-1.5(a)	43	Requirements of VOC controls
FACILITY	6NYCRR 228-1.5(b)	44	Natural gas
FACILITY	6NYCRR 228-1.5(c)	45	incineration of VOCs Calculation of overall removal efficiency of an air cleaning device
U- 00003/00003/LAM/LMN01 FACILITY	6NYCRR 228-1.5(e) 6NYCRR 228-1.5(e)(1)	118 46	Process specific RACT demonstrations Requirements for using a lesser degree of control
U- 00003/00003/OXZ/LMN01 FACILITY	6NYCRR 228-1.6(c) 6NYCRR 228-1.6(d)	122 47	Surface coating access for sampling Surface coating



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FACILITY	6NYCRR 228-1.6(e)	48, 49	control equipment test methods Surface coating control efficacy test methods
FACILITY	6NYCRR 228-1.6(f)(1)	50	monitoring incineration controls
FACILITY	6NYCRR 228-1.6(f)(2)	51	temperature rise across catalytic incinerator
FACILITY	6NYCRR 228-2.4(c)(2)	53, 54	Emission control equipment - combustion temperature monitoring for thermal oxidizer
U- 00001/00001/OXD/COOXD	6NYCRR 228-2.4(c)(3)	107	Emission control equipment - inlet and exhaust gas temperature monitoring for a catalytic oxidizer
FACILITY	6NYCRR 228-2.4(d)	55	Work Practices
U- 00003/00003/LAM/LMN01	6NYCRR 228-2.4(d)	119	Work Practices
FACILITY	6NYCRR 228-2.5(a)	56	Recordkeeping Requirements for 228- 2.4(a)
FACILITY	6NYCRR 228-2.5(b)	57	Maintaining records demonstrating compliance through the use of add-on air pollution control equipment.
U- 00003/00003/OXZ/LMN01	6NYCRR 228-2.5(b)	123	Maintaining records demonstrating compliance through the use of add-on air pollution control equipment.
FACILITY	6NYCRR 228-2.5(c)	58	Maintain Records for 5 years
U- 00003/00003/LAM/LMN01	6NYCRR 228-2.5(c)	120	Maintain Records for 5 years
FACILITY	6NYCRR 228-2.5(d)	59	Laboratory Exemption Requirements
FACILITY	6NYCRR 234.3(a)(1)(i)	60, 61	Control requirements - Ink
FACILITY	6NYCRR 234.3(a)(1)(ii)(	62	Control requirements - capture and control (installed prior to 7/8/2010)
FACILITY	6NYCRR 234.4(b)	63, 64	Testing and monitoring - test methods
U- 00001/00001/050/FLX05	6NYCRR 234.4(b)	86	Testing and monitoring - test methods
U- 00001/00001/060/FLX06	6NYCRR 234.4(b)	97	Testing and monitoring - test methods
U- 00001/00001/070/FLX07	6NYCRR 234.4(b)	100	Testing and monitoring - test methods



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U- 00001/00001/080/FLX08	6NYCRR 234.4(b)	103	Testing and monitoring - test methods
FACILITY	6NYCRR 234.4(c)	65, 66	Testing and monitoring - continuous monitoring requirements
U- 00001/00001/050/FLX05	6NYCRR 234.6	87	Handling, storage and disposal of VOCs
U- 00001/00001/060/FLX06	6NYCRR 234.6	98	Handling, storage and disposal of VOCs
U- 00001/00001/070/FLX07	6NYCRR 234.6	101	Handling, storage and disposal of VOCs
U- 00001/00001/080/FLX08	6NYCRR 234.6	104	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 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



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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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (c) (2)

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

6 NYCRR 201-6.4 (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



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probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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 there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of



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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, TRANSCONTINENTAL ULTRA FLEX INC. 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 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 citation states that the owner or operator of a product and packaging rotogravure or a wide-web flexographic printing press that relies on 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.



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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),
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 paragraph specifies continuous monitoring requirements when an oxidizer is used to control emissions from a product and packaging rotogravure or wide-web flexographic presses and compliance is demonstrated through performance tests of capture efficiency and control device efficiency.

40 CFR 63.825 (h) (3)

This requirement pertains to Printing and Publishing NESHAP Standards - Product and packaging



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rotogravure and wide-web flexographic printing.

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

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

1. For each press or group of presses controlled by a common control device, the overall organic HAP control efficiency, as determined by paragraphs (d)(1)(i)-(iii) and (d)(1)(x) of section 63.825 for each 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 citation requires that a performance test be conducted to determine the destruction efficiency provided by the control device for the purpose of meeting the removal efficiency requirements.

40 CFR 63.827 (e) (1)

This paragraph states the requirement for a performance test to determine the capture efficiency of each capture system venting organic emissions to a control device. 100 percent capture may be assumed if the capture system is a permanent total enclosure (PTE). You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of Method 204 of 40 CFR part 51, appendix M, and that all exhaust gases from the enclosure are delivered to a control device.



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40 CFR 63.828 (a) (2) (ii)

This citation specifies the requirements for temperature monitoring equipment used to demonstrate compliance.

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).

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 +/-1degree 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 citation requires that a Plan be submitted which establishes the monitoring procedures to ensure that the capture efficiency is accurately measured and maintained.

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 section specifies the required records which must be kept to demonstrate compliance.

40 CFR 63.829 (b) (1)

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



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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) (1)

This regulation requires that each owner or operator of an affected source subject to this subpart shall submit the reports specified below to the Administrator:

An initial notification required in § 63.9(b).

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

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

(iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial

notification required under § 63.9(b), provided the same information is contained in the permit application as required by § 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

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

40 CFR 63.830 (b) (2)

This paragraph states the requirements for a Notification of Performance Tests.

40 CFR 63.830 (b) (3)



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This paragraph states the requirements for a Notification of Compliance Status.

40 CFR Part 63, Subpart KK

This regulation sets forth the applicability of 40 CFR Part 63, Subpart KK for Printing and Publishing NESHAP.

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

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 212-1.4 (l) (1)

Facility owner's whose graphic arts process operations subject to Table 1 of Subpart 228-1 of this Title or process emissions sources exempt from Subpart 228-1 of this Title pursuant to Section 228-1.1 (b) of this Title, only with respect to emissions of VOCs that are not given an A rating.

6 NYCRR 212-1.4 (l) (3)

Facility owner's whose graphic arts process operations are commercial and industrial adhesives, sealants, or primers are subject to Subpart 228-2 of this Title, only with respect to emissions of VOCs that are not given an A rating.

6 NYCRR 212-1.4 (p)

Facility owner's whose graphic arts process operations subject to Section 234 meet the



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requirements of Part 212 for those air contaminants not given an Environmental Rating of A.

6 NYCRR 212-1.6 (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)

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.



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6 NYCRR 228-1.3 (a)

This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

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 (b) (1)

This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (c)

This citation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

6 NYCRR 228-1.3 (d)

This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.4 (d) (1)

This regulation sets forth the Class D coating line emission control requirements for demonstrating compliance with 6 NYCRR 228-4.



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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 specifies the requirements of VOC controls.

6 NYCRR 228-1.5 (b)

This citation specifies the requirements of fired VOC incineration control devices efficiency and seasonal shut down.

6 NYCRR 228-1.5 (c)

This citation specifies the equation for the calculation of overall removal efficiency of an air cleaning device used as a control strategy.

6 NYCRR 228-1.5 (e)

This citation specifies the required elements of a request to the Department, which may allow a specific coating process to use a degree of emission control less stringent than specified by the regulation.

6 NYCRR 228-1.5 (e) (1)

This allows owners or operators who utilizes volatile organic compound (VOC)/ solvent recovery as the



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only control equipment, to determine compliance by directly measuring recovery and specifies the methods to determine removal efficiency.

6 NYCRR 228-1.6 (c)

This citation permits Department personnel to enter a facility at reasonable hours for the purpose of collecting samples to verify compliance with VOC content limit requirements.

6 NYCRR 228-1.6 (d)

This regulation sets forth the surface coating control equipment test methods for the catalytic incinerator required for demonstrating compliance with 6 NYCRR 228-1.

6 NYCRR 228-1.6 (e)

This regulation sets forth the surface coating control efficiency test methods for the catalytic incinerator required for demonstrating compliance with 6 NYCRR 228-1.

6 NYCRR 228-1.6 (f) (1)

This regulation sets forth the incineration controls for the catalytic incinerator required for demonstrating compliance with 6 NYCRR 228-1.

6 NYCRR 228-1.6 (f) (2)

This regulation sets forth the temperature rise across the catalytic incinerator required for demonstrating compliance with 6 NYCRR 228-1.

6 NYCRR 228-2.4 (c) (2)

This regulation sets forth the combustion temperature of the thermal oxidizer, which is the control equipment.

Emission control equipment - combustion temperature monitoring for thermal oxidizer.

When a facility achieves compliance by using a thermal oxidizer, the combustion temperature must be monitored continuously. Operation records sufficient to demonstrate compliance with the requirements of this condition must be maintained as required by 6 NYCRR Part 228-2.5.

6 NYCRR 228-2.4 (c) (3)

This regulation sets forth the inlet and exhaust temperature monitoring for catalytic oxidizer.



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Emission control equipment - inlet and exhaust temperature monitoring for catalytic oxidizer.

This regulation sets forth the inlet and exhaust temperatures of the catalytic oxidizer, which is the control equipment.

When a facility achieves compliance by using a catalytic oxidizer, the inlet and exhaust gas temperature must be monitored continuously. Operation records sufficient to demonstrate compliance with the requirements of this condition must be maintained as required by 6 NYCRR Part 228-2.5.

6 NYCRR 228-2.4 (d)

This regulation describes the work practices the owner or operator of a facility with total annual actual volatile organic compound emissions of three tons or more must follow to demonstrate compliance with Part 228-2.

6 NYCRR 228-2.5 (a)

This regulation describes the record keeping requirements for facilities that are subject to a volatile organic compound limit in Section 228-2.4(a).

6 NYCRR 228-2.5 (b)

This regulation sets forth the recordkeeping requirements to maintain records demonstrating compliance with 6 NYCRR 228-2 through the use of add-on air pollution control equipments.

6 NYCRR 228-2.5 (c)

This regulation requires that the facility owner or operator maintain all records kept pursuant to Part 228-2 for at least five years, and that such records be made available to the Department upon request.



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6 NYCRR 228-2.5 (d)

This regulation sets forth the prohibitions for the laboratory exemption requirements for surface coating for demonstrating compliance with 6 NYCRR 228-2.

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

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.

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.



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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

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

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

Reason: 6 NYCRR Subpart 231-2

Reason: Non-Attainment NSR Applicability:

The facility is adding three new sources/controls, a 10-color flexographic printing press (Emission Source FLX08), a new laminator (Emission Source LMN03), and a new 45,000 CFM Megtech Regenerative Thermal Oxidizer (Emission Source/Control P2OXD2/C2OXD2) for control of the VOC emissions. The VOC emissions are ducted to the regenerative thermal oxidizers (Emission Source/Control P0OXD/C0OXD and P2OXD/C2OXD) for control of the VOC before emitting to the environment.



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In order to avoid New Source Review applicability, the facility is choosing to limit the VOC emissions from this new source at 24 tpy. The facility is requesting that the VOC emission limit for these sources be capped at 24 tons/year, thus not triggering Part 231-2 (New Source Review) - the significant project threshold for severe non-attainment areas, 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 201-6.4(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 TRANSCONTINENTAL ULTRA FLEX INC.:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
FACILITY	67	monitoring of process or control device parameters as surrogate
FACILITY	69	monitoring of process or control device parameters as surrogate
FACILITY	70	monitoring of process or control device parameters as surrogate
FACILITY	71	monitoring of process or control device parameters as surrogate
FACILITY	72	record keeping/maintenance procedures
U-00001/00001/OXD/FLX05	109	monitoring of process or control device parameters as surrogate
FACILITY	73	monitoring of process or control device parameters as surrogate
FACILITY	74	monitoring of process or control device parameters as surrogate
FACILITY	75	intermittent emission testing
FACILITY	76	intermittent emission testing
FACILITY	77	monitoring of process or control device parameters as surrogate
FACILITY	78	monitoring of process or control device parameters as surrogate
U-00001/00001/050/FLX05	93	record keeping/maintenance procedures
FACILITY	79	record keeping/maintenance procedures
FACILITY	80	record keeping/maintenance procedures
U-00001/00001/050/FLX05	94	record keeping/maintenance procedures
U-00001/00001/060/FLX06	99	record keeping/maintenance procedures
U-00001/00001/070/FLX07	102	record keeping/maintenance procedures
U-00001/00001/080/FLX08	106	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	work practice involving specific operations
FACILITY	25	work practice involving specific operations



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FACILITY	26	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
U-00001/00001	84	monitoring of process or control device parameters as surrogate
U-00002/00002/010/RENZM	111	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
U-00002/00002/010/RENZM	112	record keeping/maintenance procedures
U-00002/00002/010/RENZM	113	record keeping/maintenance procedures
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	33	monitoring of process or control device parameters as surrogate
FACILITY	34	work practice involving specific operations
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
U-00003/00003/LAM/LMN01	117	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
U-00003/00003/LAM/C2OXD	114	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
U-00003/00003/LAM/LMN02	121	work practice involving specific operations
FACILITY	43	record keeping/maintenance procedures
FACILITY	44	intermittent emission testing
FACILITY	45	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures
FACILITY	47	intermittent emission testing
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	monitoring of process or control device parameters as surrogate
FACILITY	51	monitoring of process or control device parameters as surrogate
FACILITY	53	monitoring of process or control device parameters as surrogate
FACILITY	54	monitoring of process or control device parameters as surrogate
U-00001/00001/OXD/COOXD	107	monitoring of process or control device parameters as surrogate
FACILITY	55	record keeping/maintenance procedures
U-00003/00003/LAM/LMN01	119	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	57	record keeping/maintenance procedures
U-00003/00003/OXZ/LMN01	123	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
U-00003/00003/LAM/LMN01	120	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
FACILITY	60	intermittent emission testing
FACILITY	61	intermittent emission testing
FACILITY	62	monitoring of process or control device parameters as surrogate
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
U-00001/00001/050/FLX05	86	record keeping/maintenance procedures
U-00001/00001/060/FLX06	97	record keeping/maintenance procedures
U-00001/00001/070/FLX07	100	record keeping/maintenance procedures
U-00001/00001/080/FLX08	103	record keeping/maintenance procedures
FACILITY	65	continuous emission monitoring (cem)
FACILITY	66	continuous emission monitoring (cem)
U-00001/00001/050/FLX05	87	record keeping/maintenance procedures
U-00001/00001/060/FLX06	98	record keeping/maintenance procedures



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U-00001/00001/070/FLX07	101	record keeping/maintenance procedures
U-00001/00001/080/FLX08	104	record keeping/maintenance procedures

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**Basis for Monitoring**

Transcontinental Ultra Flex Inc. is a major stationary source subject to the Title V requirements because 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:

**1. Condition #24 for 6 NYCRR 201-7, Capping out of 6 NYCRR Subpart 231-2:**

This condition is an emission unit, emission point, process and emission source level condition for EUs: U-00001 & U-00003, EPs:00001 & 00003, Processes: 080, OXD & LM3 and Emission Sources: FLX08, C0OXD, P0OXD, C2OXD, LMN03 & P2OXD 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 printing press (Emission Source FLX08), new laminator (Emission Source LMN03), and new RTO (Emission Source/Control P2OXD/C2OXD).

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.

**2. Condition #25 for 6 NYCRR 201-7, Capping out of 40 CFR Part 63, Subpart**

**KK:** This is a facility-wide condition. This condition is for the Monitoring of Process or Control device Parameters as Surrogate for Total HAP. 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



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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. The facility is capping the Total HAP at 24 tons per year.

**3. 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).

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. The facility is capping any individual HAP at 10 tons per year.

**4. Condition #31 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.

**5. Condition #33 for 6 NYCRR 228-1.3(a):** This is a facility-wide condition. This condition is for Monitoring of Process or Control Device Parameters as Surrogate for Opacity. This condition sets forth the surface coating general requirements opacity limit for demonstrating compliance with 6 NYCRR 228-1. This condition specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources

**6. Condition #34 for 6 NYCRR 228-1.3(b):** This condition is an emission unit, emission point, process and emission source level condition for EUs: U-00001& U-00003, EPs: 00001 & 00003, Processes: 080, OXD, LAM & OXZ and Emission Sources: FLX08, P0OXD, LMN03 & P2OXD 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. This condition sets forth the general requirements for recordkeeping surface coating for demonstrating compliance with 6 NYCRR 228-1.

The facility is required to keep monthly records of materials purchase/usage and other VOC content. Upon request by the Department, the facility is required to submit



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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.

**7. Condition # 44 for 6 NYCRR 228-1.5(b):** This condition is an emission unit, emission point, process and emission source/control level condition that applies to EUs: U-00001 & U-00003, EPs: 00001 & 00003, Processes: OXD, LAM & OXZ, and ES/C: FLX05, FLX06, FLX07, FLX08, P0OXD, P2OXD, LMN01, LMN02 & LMN03/ C0OXD & C2OXD for Intermittent Emission Testing of VOC for 90 percent reduction by weight. This condition sets forth the recordkeeping requirements for natural gas incineration of VOCs to maintain records for 5 years for demonstrating compliance with 6 NYCRR 228-1.

This condition requires any volatile organic compound (VOC) incinerator, used as control equipment, to be designed and operated to provide a minimum of 90 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.

**8. Condition # 47 for 6 NYCRR 228-1.6(d):** This condition is an emission unit, emission point, process and emission source level condition for EU:U-00003, EP: 00003, Processes: LAM & OXZ and Emission Sources/Controls: P2OXD, LMN01, LMN02, LMN03 & P2OXD for Intermittent Emission Testing for VOC for a minimum of 95 percent degree of air cleaning or greater. This condition sets forth the surface coating control equipment test methods for the incinerator required for demonstrating compliance with 6 NYCRR 228-1.



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(d) When an owner and/or operator of a coating line utilizes control equipment to comply with permit requirements or regulations, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

(1) The overall removal efficiency may be made by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment.

(2) For any control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment. The approved VOC CE test methods are contained Part 228-1.6(d)(2) Table 'Approved VOC CE Test Methods'. Test methods 204 through 204F (M204 - M204F) are included in Appendix M of 40 CFR part 51 (see table 1, Section 200.9 of this Title). When the sampling and analysis methods by this paragraph are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

(3) Alternative CE protocols and test methods may be allowed if the data quality objective approach or lower confidence limit approach requirements are met in conjunction with the additional criteria set forth in the EPA guidance document entitled Guidelines for Determining Capture Efficiency (see table 1, Section 200.9 of Title III). The alternative CE protocols and test methods must be approved in advance by the department. Also, the multiple line testing procedures outlined in the above guidance document can be used to determine CE if the applicable criteria are satisfied. The multiple line testing CE protocols and test methods must be approved in advance by the department.

The new RTO (Emission Control C2OXD) will have 100% overall capture based on the total enclosure. The degree of air cleaning will be determined by the stack test, which is expected to provide for an overall removal of 99%. But the facility is using a minimum of 95% for its calculations.

**9. Condition # 50 for 6 NYCRR 228-1.6(f)(1):** This condition is an emission unit, emission point, process and emission source/control level condition that applies to EUs: U-00001 & U-00003, EPs: 00001 & 00003, Processes: OXD & OXZ, and ES/C: P0OXD, P2OXD/C0OXD & P2OXD for Monitoring of Process or Control Device Parameters as Surrogate for VOC for the temperature of the combustion chamber to be between 1500 and 1600 degrees Fahrenheit.



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This condition sets forth the incineration controls for the catalytic incinerator required for demonstrating compliance with 6 NYCRR 228-1.

(f) If an air cleaning device (Regenerative Thermal Oxidizer) is used, continuous monitors for the following parameters must be installed, periodically calibrated, and operated when the associated control equipment is operating:

- (1) exhaust gas temperature of all incinerators; and
- (4) any other continuous monitoring or recording device required by the department.

The facility is to continuously monitor the temperature of the combustion chamber of the Regenerative Thermal Oxidizer (RTO), which should be maintained between 1500 and 1600 degrees Fahrenheit.

When the temperatures of the combustion chamber falls outside the approved performance test temperature range (1500 and 1600 degrees Fahrenheit); immediate action must be taken to restore control equipment to its proper operating temperature range.

**10. Condition # 51 for 6 NYCRR 228-1.6(f) (2):** This condition is an emission unit, emission point, process and emission source/control level condition that applies to EUs: U-00001 & U-00003, EPs: 00001 & 00003, Processes: OXD & OXZ, and ES/C: P0OXD, P2OXD/C0OXD & P2OXD for Monitoring of Process or Control Device Parameters as Surrogate for VOC for the temperature of the combustion chamber not to fall below 1500 degrees Fahrenheit.

This condition sets forth the temperature rise across the catalytic incinerator required for demonstrating compliance with 6 NYCRR 228-1.

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.

(f) If an air cleaning device (Regenerative Thermal Oxidizer) is used, continuous monitors for the following parameters must be installed, periodically calibrated, and operated when the associated control equipment is operating:

- (1) exhaust gas temperature of all incinerators; and
- (4) any other continuous monitoring or recording device required by the department.



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The facility is to continuously monitor the temperature of the combustion chamber of the Regenerative Thermal Oxidizer (RTO), which should not fall at any time below 1500 degrees Fahrenheit.

When the temperatures of the combustion chamber falls below the approved performance test temperature (1500 degrees Fahrenheit); immediate action must be taken to restore control equipment to its proper operating temperature.

**11. Condition # 53 for 6 NYCRR 228-2.4 ( c) (2):** This condition is an emission unit, emission point, process and emission source/control level condition that applies to EU: U-00001, EP: 00001, Process: OXD and ES/C: P0OXD/C0OXD for Monitoring of Process or Control Device Parameters as Surrogate for VOC for the temperature of the combustion chamber not to fall below 1500 degrees Fahrenheit.

This condition sets forth the combustion temperature of the thermal oxidizer, which is the control equipment.

Emission control equipment - combustion temperature monitoring for thermal oxidizer.

When a facility achieves compliance by using a thermal oxidizer, the combustion temperature must be monitored continuously. Operation records sufficient to demonstrate compliance with the requirements of this condition must be maintained as required by 6 NYCRR Part 228-2.5.

When a facility achieves compliance by using a thermal oxidizer, the combustion temperature must be monitored continuously. Operation records sufficient to demonstrate compliance with the requirements of this condition must be maintained as required by 6 NYCRR Part 228-2.5.

The minimum combustion chamber temperature shall be 1500 degrees Fahrenheit. The temperature of the oxidizer that is used to comply with 6 NYCRR Part 234 shall be monitored continuously.

Automated and charted combustion chamber temperature readings. Continuously monitor and record the temperature of the combustion chamber of the oxidizer. The test Reference Method should be according to the manufacturer's specifications that is in the RTO's operating manual.

The continuous control equipment monitors must be installed, periodically calibrated according to the manufacturer's instructions, and operated at all times that the associated control equipment (RTO) is operated.



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Automated and charted combustion chamber temperature readings.

**12. Condition # 54 for 6 NYCRR 228-2.4 ( c) (2):** This condition is an emission unit, emission point, process and emission source/control level condition that applies to EU: U-00003, EP: 00003, Process: OXZ and ES/C: P2OXD/C2OXD for Monitoring of Process or Control Device Parameters as Surrogate for VOC for the temperature of the combustion chamber not to fall below 1500 degrees Fahrenheit.

This condition sets forth the combustion temperature of the thermal oxidizer, which is the control equipment.

Emission control equipment - combustion temperature monitoring for thermal oxidizer.

When a facility achieves compliance by using a thermal oxidizer, the combustion temperature must be monitored continuously. Operation records sufficient to demonstrate compliance with the requirements of this condition must be maintained as required by 6 NYCRR Part 228-2.5.

When a facility achieves compliance by using a thermal oxidizer, the combustion temperature must be monitored continuously. Operation records sufficient to demonstrate compliance with the requirements of this condition must be maintained as required by 6 NYCRR Part 228-2.5.

The minimum combustion chamber temperature shall be 1500 degrees Fahrenheit. The temperature of the oxidizer that is used to comply with 6 NYCRR Part 234 shall be monitored continuously.

Automated and charted combustion chamber temperature readings. Continuously monitor and record the temperature of the combustion chamber of the oxidizer. The test Reference Method should be according to the manufacturer's specifications that is in the RTO's operating manual.

The continuous control equipment monitors must be installed, periodically calibrated according to the manufacturer's instructions, and operated at all times that the associated control equipment (RTO) is operated.

Automated and charted combustion chamber temperature readings.

**13. Condition #60 for 6 NYCRR 234.3 (a) (1) (i):** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00001, Emission Point: 00001, Processes: 050, 060, 070, 080 & OXD



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and ES/C: FLX05, FLX06, FLX07, FLX08, P0OXD/C0OXD for Intermittent Emission Testing of VOC for a minimum of 60 percent reduction by weight. 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.

**14. Condition #61 for 6 NYCRR 234.3 (a) (1) (i):** This condition is an emission unit level condition for EU: U-00003, Emission Point: 00003, Processes: 050, 060, 070, 080 & OXD and ES/C: FLX05, FLX06, FLX07, FLX08, P0OXD/C0OXD that applies to EU: U-00001, EP: 00001, Processes: LAM & OXZ, and ES/C: LMN01, LMN02, LMN03 & P2OXD/C2OXD for Intermittent Emission Testing of VOC for a minimum of 60 percent reduction by weight. 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.

**15. Condition #62 for 6 NYCRR 234.3 (a) (1) (ii) ('d'):** This condition is an emission unit level, emission point level, process level and emission source/control level condition for EU: U-00001, EP: 00001, Process: OXD and Emission Source/Control: FLX05, FLX06, FLX07, FLX08 & P0OXD/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,



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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 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.

**16. Condition # 65 for 6 NYCRR 234.4 ( c):** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00001, EP: 00001,Processes: OXD, LAM & OXZ, and ES/C: FLX05, FLX06, FLX07, FLX08, P0OXD, P2OXD, LMN01, LMN02 & LMN03/ C0OXD & C2OXD 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.

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.

**17. Condition #66 for 6 NYCRR 234.4 ( c):** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00003, EP: 00003 and Process: OXZ 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



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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; break-through of VOC on a carbon adsorption unit; and any other continuous monitoring or recording device required by the Department.

**18. Condition # 67 for 40 CFR 63, Subpart KK:** This condition is an emission unit, emission point, process and emission source/control level condition that applies to EUs: U-00001 & U-00003, EPs: 00001 & 00003, Processes: OXD & OXZ, and ES/C: FLX05, FLX06, FLX07, FLX08, P0OXD, LMN01, LMN02, LMN03 & P2OXD//C0OXD & P2OXD for Monitoring of Process or Control Device Parameters as Surrogate for Total HAP for a maximum limit of 25 tons per year.

This requirement pertains to NESHAP (National Emission Standard for the Printing and Publishing Industry) - applicability of MACT (section 63 NESHAPS). This condition sets forth the applicability of 40 CFR Part 63, Subpart KK for Printing and Publishing NESHAP.

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. This facility is a major source of VOC, but a minor source of HAPs. Records of all required measurements and emission calculations of each individual HAP and Total HAPs from all activities at the facility must be maintained at the facility for a period of five (5) years.

**19. Condition # 69 for 40 CFR 63.820(a), Subpart KK:** This is a facility-wide condition. This condition is for the Monitoring of Process or Control device Parameters as Surrogate for Total HAP. 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. The facility is capping any individual HAP at 9.9 tons per year.



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**20. Condition # 70 for 40 CFR 63.825(d)(1), Subpart KK:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00003, EP: 00003, Process: OXZ and ES/C: LMN01, LMN02, LMN03 and P2OXD/C2OXD for Total 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.

**21. Condition # 71 for 40 CFR 63.825(d)(1), Subpart KK:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00001, EP: 00001, Processes: OXD and ES/C: FLX05, FLX06, FLX07, FLX08, P0OXD/C0OXD for Total 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.

**22. Condition # 73 for 40 CFR 63.828(a)(4)(i), Subpart KK:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00003, EP: 00003, Process: OXZ and ES/C:



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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.

**23. Condition # 74 for 40 CFR 63.828(a)(4)(i), Subpart KK:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00001, EP: 00001, Processes: OXD and ES/C: FLX05, FLX06, FLX07, FLX08, P0OXD/C0OXD for Total 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 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.

**24. Condition # 75 for 40 CFR 63.828(a)(4)(ii), Subpart KK:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00001, EP: 00001, Processes: OXD and ES/C: P0OXD/C0OXD for Total 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 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



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greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

**25. Condition # 76 for 40 CFR 63.828(a)(4)(ii), Subpart KK:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00003, EP: 00003, Process: OXZ and ES/C: P2OXD/C2OXD for Total 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 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.

**26. Condition # 77 for 40 CFR 63.828(a)(5)(iii), Subpart KK:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00003, EP: 00003, Process: LAM and ES/C: LMN01, LMN02 & LMN03 for Total HAP for Monitoring of Process or Control Device Parameters as 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.

**27. Condition # 78 for 40 CFR 63.828(a)(5)(iii), Subpart KK:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EU: U-00001, EP: 00001, Processes: 050, 060, 070 & 080 and ES/C: FLX05, FLX06, FLX07 & FLX08 for Total HAP for



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Monitoring of Process or Control Device Parameters as 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.

**28. Condition # 84 for 6 NYCRR 212-1.6 (a):** This condition is an emission unit level and emission point level condition that applies to EUs: U-00001, U-00002 & U-00003 and EPs: 00001, 00002 & 00003 for Monitoring of Process or Control Device Parameters as Surrogate for opacity. This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

**29. Condition # 107 for 6 NYCRR 228-2.4 (c) (3):** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EUs: U-00001 & U-00003, EPs: 00001 & 00003, Processes: OXD & OXZ, and ES/C: P0OXD & P2OXD/C0OXD & P2OXD 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 sets forth the inlet and exhaust temperature monitoring for catalytic oxidizer.

Emission control equipment - inlet and exhaust temperature monitoring for catalytic oxidizer.

This condition sets forth the inlet and exhaust temperatures of the catalytic oxidizer, which is the control equipment.

When a facility achieves compliance by using a catalytic oxidizer, the inlet and exhaust gas temperature must be monitored continuously. Operation records sufficient to demonstrate compliance with the requirements of this condition must be maintained as required by 6 NYCRR Part 228-2.5.

**30. Condition # 109 for 40 CFR 63.827(d), Subpart KK:** This condition is an emission unit level, emission point level, process level and emission source/control level condition that applies to EUs: U-00001 & U-00003, EPs: 00001 & 00003, Processes OXD & OXZ and ES/C: FLX05, FLX06, FLX07, FLX08P0OXD,



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LMN01, LMN02, LMN03 & P2OXD/C0OXD & C2OXD for Monitoring of Process or Control Device Parameters as Surrogate of the destruction efficiency of 95 percent reduction by weight. The destruction efficiency is required to be at least 95 percent reduction by weight. This requirement pertains to Printing and Publishing NESHAP - performance test methods of MACT (Section 63 NESHAPS) for required procedures for initial performance test of an oxidizer.

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

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

**31. Condition # 121 for 6 NYCRR 228-1.5:** This condition is an emission unit level, emission point level, process level and emission source level condition that applies to EU: U-00003, EP: 00003, Process: LAM and Emission Source: LMN02 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/manufacture which verifies the parameters used to determine the actual VOC content of the as applied coating, for each



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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.