



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

**Permit ID: 6-2218-00017/00009**

**Renewal Number: 1**

**04/30/2010**

**Facility Identification Data**

Name: KNOWLTON TECHNOLOGIES LLC

Address: 213 FACTORY ST

WATERTOWN, NY 13601

**Owner/Firm**

Name: KNOWLTON TECHNOLOGIES LLC

Address: 213 FACTORY ST

WATERTOWN, NY 13601, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

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WATERTOWN, NY 13601

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Division of Air Resources:

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WATERTOWN, NY 13601

Phone:3157852513

Air Permitting Facility Owner Contact:

Name: FREDERICK G RUDMANN

Address: KNOWLTON TECHNOLOGIES LLC

213 FACTORY ST

WATERTOWN, NY 13601

Phone:3157820600

**Permit Description**

**Introduction**

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

**Summary Description of Proposed Project**

Application for renewal of Air Title V Facility.

**Attainment Status**



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KNOWLTON TECHNOLOGIES LLC is located in the town of WATERTOWN in the county of JEFFERSON.

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*	MARGINAL 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:**

Knowlton specialty papers manufactures a variety of specialty papers, including automotive friction and filter paper. Facility operations include three paper machines, a paper saturator/coating line, an aqueous saturator, a glue laminator, and various R & D and other support operations.

**Permit Structure and Description of Operations**

The Title V permit for KNOWLTON TECHNOLOGIES LLC

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

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

KNOWLTON TECHNOLOGIES LLC is defined by the following emission unit(s):



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Emission unit 1PAPER - This emission unit consists of 3 paper machines (pap01, pap02, and pap03) each of which includes a dryer section. Emissions vent from two points for paper machine 1, three points for paper machine 2 and one point for the pilot paper machine (pap03).

Emission unit 1PAPER is associated with the following emission points (EP):

P1EP1, P1EP2, P2EP1, P2EP2, P2EP3, P3EP1

Process: PMS is located at Building MAIN - This process involves making paper in 3 paper machines, each of which includes a dryer section.

Emission unit 1SVSAT - This emission unit involves solvent coating operations. It consists of a resin kitchen with mix vessels (mixvs) and solvent wash tank (wshtk), two paper saturator sections (satur) a unwind/wind area (windu), a dryer section (dryer), and final winder area (fwind). Hap and voc emissions from these sources are controlled by a boiler/incinerator (blrin), and are exhausted through ep m0001. After the dryer section, there is an inking station (inkst), which also vents to the boiler/incinerator.

Emission unit 1SVSAT is associated with the following emission points (EP):

M0001

Process: BLR is located at Building BBISL - This process involves the boiler/incinerator, which provides process and comfort heating to the facility. The boiler is fired with natural gas.

Process: INK is located at Building BBISL - This process consists of the ink station, where stripes may be applied to the back side of coated paper. Ink is applied using a stainless steel cylinder. This process is subject to the paper and other web coating MACT.

Process: MIX is located at Building BBISL - This process involves the mixing of coatings for use on the coating lines. The mixing process is subject to the friction materials manufacturing MACT.

Process: SS1 is located at Building BBISL - This process involves the solvent saturator, which is used to coat paper substrate. Specifically, this process consists of two paper saturator sections, an unwind/wind area, a dryer section, and a final winder area. The solvent saturator is subject to the paper and other web coating MACT.

Process: WAS is located at Building BBISL - This process involves the solvent wash tank, which is used to remove residual resin mixture from the saturator trough and rollers.

Emission unit 1TANKS - This emission unit consists of two 10,000 gallon underground tanks used to store methanol. Each tank will vent via its own emission point (eps tank 1 and tank2).

Emission unit 1TANKS is associated with the following emission points (EP):

TANK1, TANK2

Process: T01 is located at Building TNKFM - This process involves the filling and storage operations for tank1 and tank2.

Emission unit 1AQSAT - This emission unit consists of the glue laminator (gllam). Emissions vent from EP LAM01.



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Emission unit 1AQSAT is associated with the following emission points (EP):

LAM01

Process: GLL is located at Building BBISL - This process involves the use of water-based glues in the glue laminator. This process is subject to the paper and other web coating MACT.

**Title V/Major Source Status**

KNOWLTON TECHNOLOGIES LLC is subject to Title V requirements. This determination is based on the following information:

The facility is a major source of methanol (greater than 10 tpy), a HAP.

**Program Applicability**

The following chart summarizes the applicability of KNOWLTON TECHNOLOGIES LLC with regards to the principal air pollution regulatory programs:

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

**NOTES:**

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

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

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

**MACT** Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific



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emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to

be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

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

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

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

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

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

**Compliance Status**

Facility is in compliance with all requirements.

**SIC Codes**

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis

of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

**SIC Code**

**Description**

2621  
2672

PAPER MILLS EXC BUILDING PAPER  
PAPER COATED AND LAMINATED, NEC

**SCC Codes**



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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.

<b>SCC Code</b>	<b>Description</b>
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
3-07-013-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - MISCELLANEOUS PAPER PRODUCTS Other Not Classified
4-02-013-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Operation
4-02-013-03	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Mixing
4-02-013-05	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Equipment Cleanup
4-02-044-35	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - FABRIC COATING, TRANSFER COATING LAMINATION: LAMINATING DEVICE
4-05-005-97	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL OTHER NOT CLASSIFIED
4-07-008-14	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - ALCOHOLS Isopropyl Alcohol: Working Loss

**Facility Emissions Summary**

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

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		lbs/yr	Range
000092-52-4	1, 1 BIPHENYL	> 0	but < 10 tpy
000075-07-0	ACETALDEHYDE	>= 10	tpy
000108-05-4	ACETIC ACID ETHENYL ESTER	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 10	tpy but < 25 tpy
000067-66-3	CHLOROFORM	> 0	but < 10 tpy
000067-64-1	DIMETHYL KETONE	> 0	but < 2.5 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)	> 0	but < 2.5 tpy
000075-21-8	ETHYLENE OXIDE	> 0	but < 10 tpy
000050-00-0	FORMALDEHYDE	> 0	but < 10 tpy
0NY100-00-0	HAP	>= 250	tpy
000067-63-0	ISOPROPYL ALCOHOL	> 0	but < 2.5 tpy
000067-56-1	METHYL ALCOHOL	>= 10	tpy
000078-93-3	METHYL ETHYL KETONE	>= 10	tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 25	tpy but < 40 tpy
0NY075-00-0	PARTICULATES	> 0	but < 2.5 tpy
000108-95-2	PHENOL	>= 10	tpy
0NY075-00-5	PM-10	> 0	but < 2.5 tpy
025322-68-3	POLYETHYLENE GLYCOL	> 0	but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE	> 0	but < 2.5 tpy
0NY998-00-0	VOC	>= 250	tpy

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: Emergency Defense - 6 NYCRR 201-1.5**

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

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

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

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



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503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as

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of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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.



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

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

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

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

**Regulatory Analysis**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
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FACILITY	ECL 19-0301	98	Powers and Duties of the Department with respect to air pollution control



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1-SVSAT/-/BLR	40CFR 60-A.12	73	General provisions - Circumvention
1-SVSAT/-/BLR	40CFR 60-A.14	74	General provisions - Modification
1-SVSAT/-/BLR	40CFR 60-A.4	70	General provisions - Address
1-SVSAT/-/BLR	40CFR 60-A.7(a)	71	Notification and Recordkeeping
1-SVSAT/-/BLR	40CFR 60-A.9	72	General provisions - Availability of information
1-SVSAT/-/BLR	40CFR 60-Dc.48c(a)	75	Reporting and Recordkeeping Requirements.
1-SVSAT/-/BLR	40CFR 60-Dc.48c(g)	76	Reporting and Recordkeeping Requirements.
1-SVSAT/-/BLR	40CFR 60-Dc.48c(i)	77	Reporting and Recordkeeping Requirements.
1-AQSAT	40CFR 63-A	38	Subpart A - General Provisions apply to all NESHAP affected sources
1-SVSAT	40CFR 63-A	46	Subpart A - General Provisions apply to all NESHAP affected sources
1-SVSAT	40CFR 63- JJJJ.3320(b)(1)	47	Paper and Other Web Coating NESHAP - Emission Standards - Organic HAP applied
1-SVSAT	40CFR 63-JJJJ.3321(a)	48	Paper and Other Web Coating NESHAP - Operating limits
1-SVSAT	40CFR 63-JJJJ.3330(a)	49	Compliance date for existing affected sources.
1-SVSAT	40CFR 63-JJJJ.3350(e)	50, 51	Paper and Other Web Coating NESHAP - monitoring for a non- catalytic oxidizer
1-SVSAT	40CFR 63-JJJJ.3350(f)	52	Paper and Other Web Coating NESHAP - Monitoring of capture systems
1-SVSAT	40CFR 63-JJJJ.3360(e)	53	Paper and Other Web Coating NESHAP - Performance tests to determine control device efficiency
1-SVSAT	40CFR 63- JJJJ.3360(e)(1)	54	Control device efficiency performance testing.
1-SVSAT	40CFR 63- JJJJ.3360(e)(2)	55	Recording of process information during performance test.
1-SVSAT	40CFR 63- JJJJ.3360(e)(3)	56	Control device operating limits.
1-SVSAT	40CFR 63-JJJJ.3360(f)	57	Paper and Other Web Coating NESHAP - Determination of capture efficiency
1-SVSAT	40CFR 63-JJJJ.3360(g)	58	Paper and Other Web

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1-SVSAT	40CFR 63-JJJJ.3370 (e)	59	Coating NESHAP - Determination of volatile matter retained in the coated web
1-SVSAT	40CFR 63- JJJJ.3370 (k) (1)	60	Paper and Other Web Coating NESHAP - Compliance Demonstration - 95/98% control option
1-SVSAT	40CFR 63- JJJJ.3370 (k) (2)	61	Initial compliance demonstration of capture and control device efficiency.
1-SVSAT	40CFR 63- JJJJ.3370 (k) (3)	62	Calculation of HAP control efficiency. Oxidizer compliance.
1-SVSAT	40CFR 63-JJJJ.3400 (b)	63	Paper and Other Web Coating NESHAP - Reporting - Initial Notification
1-SVSAT	40CFR 63-JJJJ.3400 (c)	64	Paper and Other Web Coating NESHAP - reporting - semiannual compliance report
1-SVSAT	40CFR 63-JJJJ.3400 (d)	65	Paper and Other Web Coating NESHAP - reporting - Notification of Performance Test reports
1-SVSAT	40CFR 63-JJJJ.3400 (e)	66	Paper and Other Web Coating NESHAP - Reporting - Notification of Compliance Status report
1-SVSAT	40CFR 63-JJJJ.3400 (f)	67	Paper and Other Web Coating NESHAP - reporting - Performance test reports
1-SVSAT	40CFR 63-JJJJ.3400 (g)	68	Paper and Other Web Coating NESHAP - reporting - startup/shutdown/malf unction reports
1-SVSAT	40CFR 63-JJJJ.3410	69	Paper and Other Web Coating NESHAP - Recordkeeping requirements
1-SVSAT/-/MIX	40CFR 63- QQQQ.9495 (a)	79	Friction Materials Manufacturing - Compliance date.
1-SVSAT/-/MIX	40CFR 63- QQQQ.9500 (a)	80	Friction Materials Manufacturing - Emission Limitations for large solvent mixers
1-SVSAT/-/MIX	40CFR 63- QQQQ.9505 (a)	81	Friction Materials Manufacturing - General Compliance

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1-SVSAT/-/MIX	40CFR 63- QQQQQ.9505 (b)	82	Requirements Friction Materials Manufacturing - General Compliance
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1-SVSAT/-/MIX	40CFR 63- QQQQQ.9515 (a)	84	Friction Materials Manufacturing - initial compliance for large solvent mixers
1-SVSAT/-/MIX	40CFR 63- QQQQQ.9530 (c)	85	Friction Materials Manufacturing - deviations
1-SVSAT/-/MIX	40CFR 63- QQQQQ.9530 (e)	86	Friction Materials Manufacturing - deviations during startup, shutdown, and malfunction
1-SVSAT/-/MIX	40CFR 63-QQQQQ.9535	87	Friction Materials Manufacturing - Notification requirements.
1-SVSAT/-/MIX	40CFR 63-QQQQQ.9540	88	Friction Materials Manufacturing - Semiannual Reports
1-SVSAT/-/MIX	40CFR 63- QQQQQ.9540 (d)	89	Friction Materials Manufacturing - immediate startup, shutdown, malfunction reporting
1-SVSAT/-/MIX	40CFR 63-QQQQQ.9545	90	Friction Materials Manufacturing - Recordkeeping requirements
1-SVSAT/-/MIX	40CFR 63-QQQQQ.9550	91	Friction Materials Manufacturing - General recordkeeping provisions
1-SVSAT/-/MIX	40CFR 63-QQQQQ.9570	92	Friction Materials Manufacturing - Alternative compliance requirements.
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	99	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the

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FACILITY	6NYCRR 201-6.5(a)(4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2	General conditions
FACILITY	6NYCRR 201-6.5(a)(8)	16	General conditions
FACILITY	6NYCRR 201-6.5(c)	3	Fees
FACILITY	6NYCRR 201-6.5(c)(2)	4	General conditions
FACILITY	6NYCRR 201-6.5(c)(3)(iii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
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FACILITY	6NYCRR 201-6.5(f)(6)	18	Compliance schedules
FACILITY	6NYCRR 201-6.5(g)	24	Compliance
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1-SVSAT	6NYCRR 201-7	42	Off Permit Changes
FACILITY	6NYCRR 202-1.1	19	Permit shield
FACILITY	6NYCRR 202-2.1	7	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-2.5	8	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 211.2	100	Required emissions tests.
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1-SVSAT/-/MIX	6NYCRR 212.10(c)(4)(iii)	78	Emission Statements - record keeping requirements.
1-TANKS	6NYCRR 212.10(c)(4)(iii)	97	General Prohibitions - air pollution prohibited.
1-PAPER/-/PMS	6NYCRR 212.4(a)	41	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 212.4(b)	25	General Process Emission Sources - NOx and VOC RACT required at major facilities
1-SVSAT/M0001	6NYCRR 212.4(b)	93	General Process Emission Sources - NOx and VOC RACT required at major facilities
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			New processes
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FACILITY	6NYCRR 212.6(a)	26	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
1-SVSAT/M0001	6NYCRR 227-1.3(a)	94	Smoke Emission Limitations.
FACILITY	6NYCRR 228.1(d)	27	Will remain subject
FACILITY	6NYCRR 228.10	32	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 228.2	28	Definitions
1-SVSAT	6NYCRR 228.3(b)	43, 44, 45	VOC incinerator- 80% overall removal efficiency
1-AQSAT/LAM01	6NYCRR 228.4	39	Opacity
FACILITY	6NYCRR 228.5(a)	29	VOC recordkeeping by the facility
1-AQSAT	6NYCRR 228.5(b)	36	Use of Methods 311 or 24.
FACILITY	6NYCRR 228.5(d)	30	Department Access to Obtain Samples
1-SVSAT/M0001	6NYCRR 228.5(f)	95	Testing and monitoring; Methods 18, 25 and 25A
FACILITY	6NYCRR 228.6(a)	31	Prohibition of Sale
1-AQSAT	6NYCRR 228.7	37	Table 1
1-SVSAT	6NYCRR 231-2.2(d)(3)	42	Exemptions

**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



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maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.5 (a) (4)

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

6 NYCRR 201-6.5 (a) (7)

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

6 NYCRR 201-6.5 (a) (8)

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

6 NYCRR 201-6.5 (c)



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

6 NYCRR 201-6.5 (c) (2)

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

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

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

6 NYCRR 201-6.5 (d) (5)

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

6 NYCRR 201-6.5 (e)

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

6 NYCRR 201-6.5 (f) (6)

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

6 NYCRR 201-6.5 (g)

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

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the



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statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

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

6 NYCRR 211.3

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

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

**Facility Specific Requirements**

In addition to Title V, KNOWLTON TECHNOLOGIES LLC has been determined to be subject to the following regulations:

40 CFR 60.12

This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

40 CFR 60.14

This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.

40 CFR 60.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).



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40 CFR 60.48c (a)

This regulation requires the owner and operator of each affected facility to submit notification of the date of construction or reconstruction, anticipated startup, and actual startup of the facility. The notification must include the following information:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

40 CFR 60.48c (g)

The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40 CFR 60.48c (i)

This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

40 CFR 60.7 (a)

This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

40 CFR 60.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

40 CFR 63.3320 (b) (1)

This condition limits organic HAP emissions from emission unit 1-SVSAT to no more than 5% of the total organic HAP applied during each month. Compliance with this requirement is demonstrated by following the procedures in 40 CFR 63.3370.

40 CFR 63.3321 (a)

This condition requires the facility to operate the collection and control equipment for emission unit 1-SVSAT within the limits specified in Table 1 of 40 CFR 63 Subpart JJJJ. The operating limits will be established during the control device's performance testing.



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40 CFR 63.3330 (a)

This condition requires emission unit 1-SVSAT to be compliance with the provisions of 40 CFR 63 Subpart JJJJ by December 5, 2005.

40 CFR 63.3350 (e)

This condition establishes the requirements applicable to the continuous parameter monitoring system (CPMS) used to monitor and record the combustion temperature of the add-on control device at emission unit 1-SVSAT.

40 CFR 63.3350 (f)

The conditions requires the facility to develop and implement a site specific monitoring plan for the capture and control system used to control emissions from emission unit 1-SVSAT.

40 CFR 63.3360 (e)

This condition requires the facility to conduct a performance test on the oxidizer controlling HAP emissions generated by emission unit 1-SVSAT.

40 CFR 63.3360 (e) (1)

This condition requires an initial performance test to be conducted on the thermal oxidizer utilized at emission unit 1-SVSAT. The condition requires a minimum of 3 one hour test runs be performed simultaneously at the inlet and outlet of the thermal oxidizer. The condition also outlines the test methods to be used and the calculation method to be followed in order to determine the HAP destruction efficiency of the thermal oxidizer.

40 CFR 63.3360 (e) (2)

This condition requires the facility to record process information necessary to determine the conditions that exist during the performance testing done in accordance with 40 CFR 63.3360(e)(1).

40 CFR 63.3360 (e) (3) (i)

This condition requires the facility to establish an operating limit for the thermal oxidizer combustion temperature during the initial performance test. It specifies the location of the combustion temperature readings and the frequency of those readings. The condition also specifies that an average combustion temperature be determined and sets the average combustion temperature as a minimum operating level.

40 CFR 63.3360 (f)

This condition requires the facility to make a demonstration that the HAP capture system employed at emission unit 1-SVSAT is permanent total enclosure (PTE) as defined in section 6 of EPA Method 204 of 40 CFR 51 Appendix M.

40 CFR 63.3360 (g)



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This condition allows the facility the option of taking into account the mass of volatile matter retained in the coated web after drying or otherwise not emitted to the atmosphere when demonstrating compliance with the HAP emission limit of this rule. If the facility chooses this option it must develop a testing protocol for determining the mass of volatile matter retained in the coated web and submit the protocol to EPA for approval.

40 CFR 63.3370 (e)

This condition requires the facility to operate its capture system and control device such that the overall organic HAP control efficiency, at emission unit 1-SVSAT, is at least 95% for each month. As an alternative the condition allows the capture system and control device to operate such that the outlet organic HAP content is no greater than 20 ppmv by compound on a dry basis.

40 CFR 63.3370 (k) (1)

This condition requires the facility to demonstrate initial compliance through performance tests of capture efficiency and thermal oxidizer efficiency and continuing compliance through continuous monitoring of capture system and thermal oxidizer operating parameters that were established in accordance with 40 CFR 63.3350 (e) & (f).

40 CFR 63.3370 (k) (2) (i)

This condition provides the equation to be used to calculate the overall organic HAP removal efficiency at emission unit 1-SVSAT.

40 CFR 63.3370 (k) (3) (i)

This condition clarifies how the facility can operate its capture system and thermal oxidizer in order to be in compliance with the emission standard specified at 40 CFR 63.3320(b). The oxidizer must operate at an average operating value parameter greater than the operating parameter value established by 40 CFR 63.3360(e) for each 3-hour period. The capture system must maintain an operating parameter at an average value greater than or less than (as appropriate) the operating parameter established in accordance with 40 CFR 63.3350(f).

40 CFR 63.3400 (b)

This condition requires the facility to submit an initial notification, as specified in 40 CFR 63.9(b), by no later than December 5, 2004.

40 CFR 63.3400 (c)

This condition requires the facility to submit semiannual compliance reports by July 31 (for January 1 - June 30) and January 31 (for July 1 - December 31) each year.

40 CFR 63.3400 (d)

This condition requires the facility to submit a notification of performance tests, as specified in 40 CFR 63.9(e), to be done on the capture system and thermal oxidizer. This submittal shall include a site



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specific  
test plan as specified in 40 CFR 63.7(c)(2).

40 CFR 63.3400 (e)

This condition requires the facility to submit a Notification of Compliance Status as required in 40 CFR 63.9(h).

40 CFR 63.3400 (f)

This condition requires the facility to submit performance test reports, as specified in 40 CFR 63.10(d)(2). These performance test reports must be submitted as part of the notification of compliance status required in 40 CFR 63.3400(e).

40 CFR 63.3400 (g)

The condition requires submission of startup, shutdown and malfunction reports as specified in 40 CFR 63.10(d)(5).

40 CFR 63.3410

This condition specifies a list of records that the facility must maintain on a monthly basis. The records must be kept for at least 5 years after each occurrence that requires record keeping. The latest 2 years must be kept on site and readily available and the remaining 3 years may be kept off site or on computer.

40 CFR 63.9495 (a)

This condition requires the solvent mixers that make up process MIX of emission unit 1-SVSAT to comply with the requirements of 40 CFR 63 Subpart QQQQQ by no later than October 18, 2005.

40 CFR 63.9500 (a)

This condition states that the facility must reduce the hazardous air pollutants that are emitted to the atmosphere by 70%.

40 CFR 63.9505 (a)

This condition requires the facility to be in compliance with the 70% or 85% reduction of emissions at all times except during times when the equipment is starting up, shutting down, or has malfunctioned.

40 CFR 63.9505 (b)

This condition requires the facility to keep the equipment used to control air pollution in good working order in order to prevent the air pollution equipment from failing as much as possible.

40 CFR 63.9505 (c)

This condition requires that the facility develop a plan which tells the facility operators how to handle the equipment during periods when the equipment is starting up, shutting down, and malfunctioning, in



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order  
to minimize the amount of hazardous air pollutants that escape to the atmosphere.

40 CFR 63.9515 (a)

This condition requires the facility to be in compliance initially with the 70% reduction for solvent mixers over 2000 pounds by requiring the facility to calculate the emissions of hazardous air pollutants during the first 7 days of operation and calculate whether the emissions are below the 70% limit.

40 CFR 63.9530 (c)

This condition requires the facility to report any instances where the emission limits in this rule are not met. These are deviations from the limit, but are not necessarily violations of the rule.

40 CFR 63.9530 (e)

This condition states that if the facility exceeds the emission limits in this rule during periods when the equipment is starting up, shutting down, or malfunctioning, the exceedance is not a violation if they demonstrate that their startup, shutdown, malfunction plan was followed during the exceedance period to show that the facility properly tried to reduce the emissions of hazardous air pollutants during the period.

40 CFR 63.9535

This condition details a list of notifications that the facility must submit per the requirements of 40 CFR 63 Subpart A, General Provisions.

40 CFR 63.9540

This condition requires the facility to periodically report the status of their compliance with this rule to NYSDEC. Some of the items to be included in this report are any exceedances of the emission limits, and periods of startup, shutdown, or malfunction, and a signature from a responsible official.

40 CFR 63.9540 (d)

This condition requires the facility to immediately report any instance when the startup, shutdown, malfunction plan was not followed.

40 CFR 63.9545

This condition details the information that the facility must keep available for inspectors to view.

40 CFR 63.9550

This condition requires the facility to keep records for at least 5 years and that the records must be available on site for at least 2 of those 5 years.

40 CFR 63.9570

This condition allows the facility to request an alternate method of demonstrating compliance at process



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MIX, of emission unit 1-SVSAT, if they utilize a control technique other than a solvent recovery system and/or solvent substitution. The facility must request approval of this alternate compliance method from the EPA. The condition also outlines what must be submitted as part of the request for approval.

40 CFR Part 63, Subpart A

The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40CFR63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that describe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

Section 63.1 relates to general applicability considerations both before and after promulgation of standards for a source category. Section 63.2 contains definitions common to the MACT rules.

Section 63.3 contains units and abbreviations used in the MACT rules. Section 63.4 outlines generally prohibited activities such as operating in noncompliance with applicable standards and circumventing the rules. Section 63.5 describes how construction or reconstruction trigger requirements for preconstruction review.

Section 63.6 covers compliance issues such as how default new source and existing source compliance dates are calculated for each MACT rule; operation and maintenance requirements; startup, shutdown, and malfunction plan requirements; methods for determining compliance; alternative emission standards; compliance extensions; and compliance exemptions.

Section 63.7 covers performance testing requirements such as default notification and test deadlines; quality assurance programs: site-specific test plans; test facilities; general test conduct requirements; use of alternative test methods; data analysis, recordkeeping, and reporting; and performance test waivers.

Section 63.8 covers default monitoring requirements for continuous or periodic parameter monitoring, continuous opacity monitoring, and continuous emission monitoring.

Section 63.9 contains default notification requirements and deadlines for initial notifications, requests for extension of compliance, notification that a source is subject to special compliance requirements, continuous monitoring related notifications, and notifications of compliance status (also referred to as initial compliance reports).

Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

6 NYCRR 212.10 (c) (4) (iii)

This rule allows those sources which cannot achieve an overall removal efficiency of 81% or use coatings

that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the department.

6 NYCRR 212.4 (a)



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This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6 NYCRR 212.4 (b)

212.4(b) establishes a limit on gas and liquid particulates.

6 NYCRR 212.4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

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 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 (d)

This citation states that any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228, will remain subject to these provisions even if the annual potential to emit volatile organic compounds for the facility later falls below the thresholds set forth in this regulation.

6 NYCRR 228.10

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

6 NYCRR 228.2

This citation specifies the formula used to calculate the maximum permitted pounds of volatile organic compound per gallon of coating specified in tables 1 and 2 of 6 NYCRR Part 228.

6 NYCRR 228.3 (b)

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



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6 NYCRR 228.4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6 NYCRR 228.5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacture 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 228.5 (b)

This citation requires the owner and operator of any emission source subject to Part 228 to, upon request by the Department, use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63

and 60, to measure the volatile content, water content, density, volume of solids and weight of solids in order to determine the actual VOC content of an applied coating during a compliance demonstration.

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

6 NYCRR 228.5 (f)

This condition specifies the notification requirements, protocol requirements and test methods that the facility must follow when measuring the VOC concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency.

6 NYCRR 228.6 (a)

This citation exempts specific coatings (or under specific conditions) from the prohibition of sale or specification.

6 NYCRR 228.7

Table 1 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6 NYCRR 231-2.2 (d) (3)

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment



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contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The purpose of Section 231-2.2 is to define what new or modified facilities are subject to the requirements set forth in the other sections of the rule. The specific applicability exemptions to Subpart 231-2 are set forth in subsection (d).

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

**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>
1-SVSAT	40 CFR Part 64	COMPLIANCE ASSURANCE MONITORING

Reason: The Compliance Assurance Monitoring provisions contained in 40 CFR Part 64 do not apply to emission unit 1-SVSAT. This emission unit is exempted from those requirements as detailed in 40 CFR Part 64.2(b)(1) - Exempt emission limitations or standards:

The requirements of this part shall not apply to any of the following emission limitations or standards:

(i) Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.

1-PAPER/-/PMS	6 NYCRR 212.10 (c) (1)	NOx and VOC RACT required at major facilities
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Reason: This facility will not have to comply with the VOC RACT requirements of 6 NYCRR Part 212.10(c) as long as it maintains a VOC emission rate potential (ERP) below 3 lb/hr for each of the 3 paper machines making up this emission unit.

Facility will maintain records demonstrating the VOC ERP for each product run on the 3 paper machines. If at anytime the ERP equals or exceeds 3 lb/hr of VOC, the facility will submit a VOC RACT compliance plan to the Department as required by 6 NYCRR Part 212.10(c)(1).

NOTE: Non-applicability determinations are cited as a permit



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

**Compliance Certification**

**Summary of monitoring activities at KNOWLTON TECHNOLOGIES LLC:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
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1-SVSAT/-/BLR	75	record keeping/maintenance procedures
1-SVSAT/-/BLR	76	record keeping/maintenance procedures
1-SVSAT/-/BLR	77	record keeping/maintenance procedures
1-SVSAT	47	record keeping/maintenance procedures
1-SVSAT	48	record keeping/maintenance procedures
1-SVSAT	50	monitoring of process or control device parameters as surrogate
1-SVSAT	51	monitoring of process or control device parameters as surrogate
1-SVSAT	52	record keeping/maintenance procedures
1-SVSAT	53	record keeping/maintenance procedures
1-SVSAT	54	intermittent emission testing
1-SVSAT	56	monitoring of process or control device parameters as surrogate
1-SVSAT	57	record keeping/maintenance procedures
1-SVSAT	59	record keeping/maintenance procedures
1-SVSAT	60	intermittent emission testing
1-SVSAT	61	record keeping/maintenance procedures
1-SVSAT	62	record keeping/maintenance procedures
1-SVSAT	63	record keeping/maintenance procedures
1-SVSAT	64	record keeping/maintenance procedures
1-SVSAT	65	record keeping/maintenance procedures
1-SVSAT	66	record keeping/maintenance procedures
1-SVSAT	67	record keeping/maintenance procedures
1-SVSAT	68	record keeping/maintenance procedures
1-SVSAT	69	record keeping/maintenance procedures
1-SVSAT/-/MIX	80	record keeping/maintenance procedures
1-SVSAT/-/MIX	81	record keeping/maintenance procedures
1-SVSAT/-/MIX	82	record keeping/maintenance procedures
1-SVSAT/-/MIX	83	record keeping/maintenance procedures
1-SVSAT/-/MIX	84	intermittent emission testing
1-SVSAT/-/MIX	85	record keeping/maintenance procedures
1-SVSAT/-/MIX	86	record keeping/maintenance procedures
1-SVSAT/-/MIX	87	record keeping/maintenance procedures
1-SVSAT/-/MIX	88	record keeping/maintenance procedures
1-SVSAT/-/MIX	89	record keeping/maintenance procedures
1-SVSAT/-/MIX	90	record keeping/maintenance procedures
1-SVSAT/-/MIX	91	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	work practice involving specific operations
1-SVSAT	42	work practice involving specific operations



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FACILITY	7	record keeping/maintenance procedures
1-SVSAT/-/MIX	78	record keeping/maintenance procedures
1-TANKS	97	work practice involving specific operations
1-PAPER/-/PMS	41	record keeping/maintenance procedures
1-SVSAT/M0001	93	record keeping/maintenance procedures
1-PAPER	40	monitoring of process or control device parameters as surrogate
1-TANKS	96	monitoring of process or control device parameters as surrogate
FACILITY	26	record keeping/maintenance procedures
1-SVSAT/M0001	94	monitoring of process or control device parameters as surrogate
FACILITY	32	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
1-SVSAT	43	monitoring of process or control device parameters as surrogate
1-SVSAT	44	monitoring of process or control device parameters as surrogate
1-SVSAT	45	intermittent emission testing
1-AQSAT/LAM01	39	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
1-AQSAT	36	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
1-SVSAT/M0001	95	record keeping/maintenance procedures
1-AQSAT	37	work practice involving specific operations

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**Basis for Monitoring**

1) 6 NYCRR Part 201-6.5(c)(3)(ii): This facility is a major source as defined in 6 NYCRR Part 201-2. Any facility that receives a Title V permit is required to make a semi-annual monitoring report.

2) 6 NYCRR Part 201-6.5(e): This facility is a major source as defined in 6 NYCRR Part 201-2. Any facility that receives a Title V permit is required to submit an annual compliance certification.

3) 6 NYCRR Part 201-7.2(c): This facility has a volatile organic compound (VOC) potential to emit (PTE) > 50 tons per year (tpy) making it a major source as defined in 6 NYCRR Part 231-2.1. Emission unit 1-SVSAT was modified but the facility accepted a VOC emission cap, for the emission unit, to less than 40 tpy in order to avoid the new source review (NSR) requirements of 6 NYCRR Part 231-2.

4) 6 NYCRR Part 202-2.1: Any facility issued a Title V permit must submit an annual emission statement by April 15th every year.

5) 6 NYCRR Part 212.4(a): Emission sources not covered or exempted from any other rule are considered process sources per 6 NYCRR Part 212. For this facility these include all emission sources at emission units 1-PAPER & 1-TANKS. All process sources regulated under 6 NYCRR Part 212 must operate in a manner as not to exceed the ambient guideline concentrations contained in NYSDEC Program Policy DAR-1 - Guidelines for the Control of Toxic Ambient Air Contaminants.

6) 6 NYCRR Part 212.4(c) & 212.6(a): Emission sources not covered or exempted from any other rule are considered process sources per 6 NYCRR Part 212. For this facility these include all emission sources at emission units 1-PAPER & 1-TANKS. All process sources regulated under 6 NYCRR Part 212 must operate in a manner as not to exceed the particulate emission rate and opacity limits contained in that rule.



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7) 6 NYCRR Part 212.10(c)(4)(iii): The facility has a VOC PTE > 50 tpy thus, the VOC reasonably available control technology (RACT) requirements of 6 NYCRR Part 212 apply to all process emission points with an emission rate potential (ERP) of VOC > 3.0 lb/hr. The emission point associated with emission unit 1-TANKS has a VOC ERP > 3.0 lb/hr but has requested and received (as part of their Title V application) a VOC RACT variance due to economic infeasibility. The emission unit was given an annual methanol throughput limit to coincide with the methanol throughput used in the VOC RACT variance demonstration. The facility has also requested and received a VOC RACT variance due to economic infeasibility for process MIX. This process involves coating preparation in the resin kitchen and the permit requires all mix tanks in the resin kitchen to operate with closed lids during times that resin kitchen emissions are not being vented to the incinerator/boiler. Resin kitchen emissions must be vented to the incinerator/boiler at all times that the solvent saturator is in operation. The facility must re-evaluate its VOC RACT options upon renewal of its Title V permit.

8) 6 NYCRR Part 227-1.3(a): Emission unit 1-SVSAT, Process BLR meets the definition of stationary combustion installation in 6 NYCRR Part 227-1. All sources required to comply with that rule must meet the opacity limit contained in the rule.

9) 6 NYCRR Part 228.1(d); 228.2; 228.4; 228.5(a), (b), (d) & (f); 228.6(a); 228.7 and 228.10: This facility has a VOC PTE > 10 tpy and coats paper at emission unit 1-SVSAT. Therefore, the VOC RACT requirements and all other emission limits, monitoring, recordkeeping and reporting requirements of 6 NYCRR Part 228 apply to that emission unit's paper coating operations.

10) 6 NYCRR Part 228.3(b): The overall VOC removal efficiency requirement contained in this permit was a requirement of consent order R6-20020909-98.

11) 40 CFR Part 60.48c(a), (g) & (i): Process BLR of emission unit 1-SVSAT is an affected source as defined in 40 CFR Part 60, Subpart Dc. Since the boiler fires natural gas only it only has to comply with the fuel use monitoring and recordkeeping requirements of the rule.

12) 40 CFR Part 63.3320(b)(1); 63.3321(a); 63.3350(e) & (f); 63.3360(e), (e)(1) & (e)(3)(i); 63.3360(f); 63.3370(e); 63.3370(k)(1), (k)(2)(i) & (k)(3)(i); 63.3400(b), (c), (d), (e), (f) & (g) and 63.3410: This facility is a major source of hazardous air pollutants (HAP) that includes an affected source (emission unit 1-SVSAT) as defined by 40 CFR Part 63, Subpart JJJJ. Therefore, the sources associated with emission unit 1-SVSAT must comply with the HAP control, monitoring, record keeping and reporting requirements of the rule that apply to a source using a thermal oxidizer as its compliance option. The compliance deadline for emission unit 1-SVSAT is December 5, 2005.

13) 40 CFR 63.9495(a); 63.9500(a); 63.9505(a), (b) & (c); 63.9515(a); 63.9530(c) & (e); 63.9535; 63.9540; 63.9540(d); 63.9545 and 63.9550: This facility is a major source of HAP that includes an affected source (emission unit 1-SVSAT, process MIX) as defined by 40 CFR Part 63, Subpart QQQQ. Therefore, this process must comply with the HAP control, monitoring, record keeping and reporting requirements of the rule. The compliance deadline for process MIX is October 18, 2005.