

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 6-2336-00028/00051    Renewal Number: 1**



**02/01/2006**

**Facility Identification Data**

Name: FIBERMARK NORTH AMERICA INC  
Address: 5492 BOSTWICK STREET  
LOWVILLE, NY 13367

**Owner/Firm**

Name: FIBERMARK INC  
Address: 161 WELLINGTON DR  
PO BOX 489  
BRATTLEBORO, VT 05302-0489, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
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Air Permitting Contact:  
Name: JONATHAN ROSE  
Address: FIBERMARK INC  
5492 BOSTWICK ST  
LOWVILLE, NY 13367  
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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.

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**Summary Description of Proposed Project**

Application for renewal of Air Title V Facility.

**Attainment Status**

FIBERMARK NORTH AMERICA INC is located in the town of LOWVILLE in the county of LEWIS. 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.)

<b>Criteria Pollutant</b>	<b>Attainment Status</b>
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone* ATTAINMENT)	TRANSPORT REGION (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**

The facility manufactures products for books & folders, utilizing RACT compliant coating machines and one print machine utilizing both solvent based and aqueous inks, which are applied to a paper, leather or textile substrate. Other sources at the facility include two boilers fueled with #6 oil or natural gas, coating mixing & handling areas, and solvent storage tanks.

**Permit Structure and Description of Operations**

The Title V permit for FIBERMARK NORTH AMERICA 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

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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.

FIBERMARK NORTH AMERICA INC is defined by the following emission unit(s):

Emission unit 000001 - Facility Boilers - North American Model 3350 - Emission Point 00001 and ORR & Sembower Inc. - Emission Point 00002.

Emission unit 000001 is associated with the following emission points (EP): 00001, 00002

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

Process: 011 is located at Building MAIN - Boiler firing #6 Fuel Oil, boiler (BLR01) is located in the plant. The boiler presently burns #6 fuel oil. The boiler is used to generate steam that is used throughout the facility. Process 011 thrupt values are based on published boiler capacity. BLR01 is limited to a maximum firing rate of 75% of its rated capacity.

Process: 012 is located at Building MAIN - Boilers burning natural gas. Two boilers (BLR01 and BLR02) are located in the plant. Both boilers were retrofitted to burn natural gas in 12/97. Process 012 thrupt values are based on published boiler capacities.

Emission unit 000002 - Facility Coaters - Aqueous Coater 2AQ (emission points 00033, 00034, 00035 and 00036); Aqueous Coater 8AQ (emission points 00037, 00038, 00039 and 00040); Aqueous Coater 11 (emission point 00024); and Aqueous Coater 12 (emission point 00009).

Aqueous coaters are two and three station coaters, front and back, paper and other substrates, water Base Coaters and Dryers.

One station Aqueous Printer/Coater 4AQ (emission point 00041), front and/or back paper or other substrates and associated dryers.

This unit also includes emission point 00042, 00043, 00044, and 00045 which ventilate the 55-gallon drum staging areas located at each coater.

Emission unit 000002 is associated with the following emission points (EP):

00009, 00024, 00033, 00034, 00035, 00036, 00037, 00038, 00039, 00040, 00041, 00042, 00043, 00044, 00045

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

Process: 021 is located at Building MAIN - This process includes 2 operational coaters at the plant.

Inside coaters 11, and 12; coating is applied to a paper or other substrate and then dried to create a rigid or semi-rigid binder for books and folders.

Process: 022 is located at Building MAIN - The first coating head applies an aqueous latex based acrylic coating to a paper substrate. The web then enters the first two zone dryer, which is natural gas fired (1.5 MMBTU/HR/ZONE). The web is then cooled and receives a topcoat. The web then enters the second two zone dryer, which is natural gas fired (1.5 MMBTU/HR/ZONE). The web is then cooled, and a water back up coat applied. The web then enters the second two zone dryer and is finally rewound.

Process: 024 is located at Building MAIN - The single station printer/coater will apply to paper and other substrates by utilizing various application methods such as Rotogravure, Knife and Stork (rotary silk screen) Printing. Once the print is applied, the web then enters a two-zone dryer that is natural gas fired (500,000 but/hr per Zone). The web is then cooled and finally rewound.

Process: 026 is located at Building MAIN - The single station printer/coater will apply coatings to paper and other substrates. Once the coating is applied, the web then enters a two-zone dryer that is natural gas fired (500,000 but/hr per Zone). The web is then cooled and finally rewound.

Process: 028 is located at Building MAIN - Process exhaust originating from 55 gallon drum staging area at emissions sources CR2AQ, CR8AQ, CTR11 and PR4AQ. Process 028 total throughput values are based on coater throughputs. (All emissions from these exhausts will be captured in the monthly coating usage)

Emission unit 000003 - Waterbased coating make-up room Schold's Mixer. Emission point 00016.

Water-based coating make-up room. Emission point 00031 associated with room.

Emission unit 000003 is associated with the following emission points (EP):

00016, 00031

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

Process: 031 is located at Building MAIN - Designated areas in the plant are used for the blending and mixing of solvent based and water based coatings.

Emission unit 000005 - This emission unit includes Printer/Coater 3AQ (previously coater #5), Aqueous Coater 10AQ (previously Tandem Coater), Printer #1 and Printer #2, and associated dryers, mixing and dispensing operations, and wastewater treatment operations.

Emission unit 000005 is associated with the following emission points (EP):

00048, 00049, 00050, 00052, 00053, 00054, 00055, 00056, 00057

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

Process: 030 is located at Building MAIN - This process includes Coater #5, the Tandem Coater, Printer #1, Printer #2, print heads and associated floor sweeps that utilize multiple coating stations to apply coatings to paper or other substrates. Once the coatings are applied, the web enters multiple zone gas fired dryers; the web is then cooled and finally rewound.

Process: 032 is located at Building MAIN - Wash down water from aqueous coating and printing lines is treated by pH adjustment to precipitate metals, which are removed using two rotary vacuum drum filters prior to discharge.

Process: 033 is located at Building MAIN - This process includes the dispensing of coating and ink solutions into 55-gallon drums in the facility's color mix room. Raw materials and previously mixed formulations are added to the drums utilizing automatic and manual dispensing systems. Prior to dispensing, raw materials are combined and mixed into solution to match formulations. The raw

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materials are stored utilizing: larger storage tanks, tote bins, drums and pails. All of the equipment used prior to dispensing already exists or is exempt from permitting. After dispensing, the solutions are transported for use at the coating and printing equipment. One dispenser is also located in the printer area.

Process: 034 is located at Building MAIN - This process includes coater #5, Printer #1, Printer #2, print heads and associated floor sweeps that utilize multiple stations to apply inks to paper and other substrates by using knife and rotogravure printing. Once the print is applied the web enters multiple zone gas fired dryers; the web is then cooled and finally rewound.

**Title V/Major Source Status**

FIBERMARK NORTH AMERICA INC is subject to Title V requirements. This determination is based on the following information:

This facility is a major source of VOC (greater than 50 tpy), sulfur dioxide (greater than 100 tpy), and total HAP (greater than 25 tpy).

**Program Applicability**

The following chart summarizes the applicability of FIBERMARK NORTH AMERICA INC with regards to the principal air pollution regulatory programs:

<b>Regulatory Program</b>	<b>Applicability</b>
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) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

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

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

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

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

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

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

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

**SIP**            State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will

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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
2672	PAPER COATED AND LAMINATED, NEC

### SCC Codes

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

SCC Code	Description
3-01-020-17	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PRINTING INK MANUFACTURE PREMIX/PREASSEMBLY: DRUMS
1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 6 Oil
4-05-005-01	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Gravure - 2754
4-02-013-03	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Mixing
4-02-013-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Operation
4-02-013-04	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING

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4-02-820-02 Coating Storage  
 SURFACE COATING OPERATIONS  
 SURFACE COATING OPERATIONS - WASTEWATER,  
 AGGREGATE  
 WASTEWATER: PROCESS EQUIPMENT DRAINS

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate 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
000107-21-1	1,2-ETHANEDIOL (HAP)		> 0 but < 10 tpy
000104-76-7	1-HEXANOL, 2-ETHYL		>= 2.5 tpy but < 10 tpy
000872-50-4	1-METHYL-2-PYRROLIDONE		>= 10 tpy but < 25 tpy
000079-10-7	2-PROPENOIC ACID (HAP)		> 0 but < 10 tpy
000141-32-2	2-PROPENOIC ACID, BUTYL ESTER C7H12O2		>= 2.5 tpy but < 10 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER (HAP)		> 0 but < 10 tpy
000098-83-9	ALPHA-METHYLSTYRENE		>= 2.5 tpy but < 10 tpy
007664-41-7	AMMONIA		>= 2.5 tpy but < 10 tpy
000071-36-3	BUTANOL		>= 2.5 tpy but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
034590-94-8	DIPROPYLENE GLYCOL METHYL ETHER		>= 2.5 tpy but < 10 tpy
000111-90-0	ETHANOL, 2- (2-ETHOXYETHOXY) (HAP)		>= 10 tpy
000112-34-5	ETHANOL, 2- (2-BUTOXYETHOXY) - (HAP)		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)	2955	
068606-21-3	GLYCOLS, C10-16		>= 2.5 tpy but < 10 tpy
0NY100-00-0	HAP		>= 25 tpy but < 40 tpy
000078-83-1	ISOBUTYL ALCOHOL		>= 2.5 tpy but < 10 tpy
000067-63-0	ISOPROPYL ALCOHOL		>= 10 tpy but < 25 tpy

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007439-92-1	LEAD (HAP)	> 0 but < 10 tpy
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER (HAP)	> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL (HAP)	> 0 but < 10 tpy
000057-55-6	METHYLETHYL GLYCOL	>= 2.5 tpy but < 10 tpy
000121-44-8	N,N-DIETHYL ETHANAMINE (HAP)	> 0 but < 10 tpy
064742-53-6	NAPHTHA (PETROLEUM) HYDROTREATED LIGHT	>= 2.5 tpy but < 10 tpy
008030-30-6	NAPHTHA	>= 2.5 tpy but < 10 tpy
008002-09-3	OIL OF FIR-SIBERIAN	>= 2.5 tpy but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 40 tpy but < 50 tpy
0NY075-00-0	PARTICULATES	>= 10 tpy but < 25 tpy
000107-41-5	PENTANEDIOL, METHYL	>= 2.5 tpy but < 10 tpy
0NY075-00-5	PM-10	>= 10 tpy but < 25 tpy
025265-71-8	PROPANOL, OXYBIS	>= 2.5 tpy but < 10 tpy
000103-11-7	PROPENOIC ACID, 2-ETHYLHEXYL ESTER	>= 2.5 tpy but < 10 tpy
002530-83-8	SILANE, TRIMETHOXY [3- (OXIRANYLM ETHOXY) PROPYL] -	>= 2.5 tpy but < 10 tpy
000100-42-5	STYRENE (HAP)	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 100 tpy but < 250 tpy
0NY998-00-0	VOC	>= 50 tpy but < 100 tpy

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision

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contained in any applicable requirement.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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

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

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

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

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
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FACILITY	40CFR 63-A.4	Prohibited Activities and Circumvention	44
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FACILITY	40CFR 63-JJJJ.3330 (a)	Compliance date for existing affected sources.	62
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FACILITY	40CFR 63-JJJJ.3360 (c)	Paper and Other Web Coating NESHAP - Determination of organic HAP content	64
FACILITY	40CFR 63-JJJJ.3360 (d)	Paper and Other Web Coating NESHAP - Determination of volatile organic content and coating solids content	65
FACILITY	40CFR 63-JJJJ.3370 (b)	Paper and Other Web Coating NESHAP - Requirements for showing compliance	66
FACILITY	40CFR 63-JJJJ.3370 (c)	Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials	67
FACILITY	40CFR 63-JJJJ.3370 (c) (5)	Paper and Other Web Coating NESHAP - Compliance demonstration for "as-applied" compliant coatings	68
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FACILITY	40CFR 63-JJJJ.3400 (e)	Paper and Other Web Coating NESHAP - Reporting - Notification of Compliance Status report	72
FACILITY	40CFR 63-JJJJ.3410 (a)	Paper and Other Web Coating NESHAP - Record keeping requirements.	73
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FACILITY	40CFR 63-KK.821 (a) (2)	Printing and Publishing NESHAP-designation of affected sources	46
FACILITY	40CFR 63-KK.821 (a) (3)	Printing and Publishing NESHAP-designation of affected sources	47
FACILITY	40CFR 63-KK.821 (c)	Printing and Publishing NESHAP-designation of affected sources	48
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0-00005/-/034	40CFR 63-KK.823	Printing and Publishing NESHAP-standard: general	99
FACILITY	40CFR 63-KK.825 (b)	Printing and Publishing NESHAP-standard: product and packing rotogravure and wide-web flexographic printing	49
FACILITY	40CFR 63-KK.826 (b)	Printing and Publishing NESHAP-compliance dates	50
FACILITY	40CFR 63-KK.827 (b) (2)	Performance Test Methods - Printing & Publishing MACT	51
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**Applicability Discussion:**

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

ECL 19-301.

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

6NYCRR Part 200-.6

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

6NYCRR Part 200-.7

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

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#### 6NYCRR Part 201-3.2(a)

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

#### 6NYCRR Part 201-3.3(a)

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

#### 6NYCRR Part 201-6

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

#### 6NYCRR Part 201-6.5(c)

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

#### 6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records

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and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

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

6NYCRR Part 201-6.5(e)

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

6NYCRR Part 202-1.1

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

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-.2

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

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

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#### 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, FIBERMARK NORTH AMERICA INC has been determined to be subject to the following regulations:

#### 40CFR 52-A.21 (i) (1).

Any stationary source or modification to which the requirements of this regulation apply cannot begin construction without a valid permit.

#### 40CFR 63-A.4

Section 63.4 outlines generally prohibited activities such as operating in noncompliance with applicable standards and circumventing the rules. It requires sources to comply with Part 63 requirements regardless of whether those requirements have been included in a title V (NYCRR Part 201-6) permit for the source. Intentional or unintentional concealment of an emission that would otherwise violate a standard is itself a violation.

#### 40CFR 63-JJJ.3300

This condition outlines the definition of what is and isn't an affected source under 40 CFR 63 Subpart JJJ.

#### 40CFR 63-JJJ.3320 (b) (2)

This condition limits organic HAP emissions to no more than 1.6% of the mass of coating materials applied each month for all new affected sources, as defined in 40 CFR 63 Subpart JJJ. This condition also limits organic HAP emissions to no more than 4% of the mass of coating materials applied each month for all existing affected sources, as defined in 40 CFR 63 Subpart JJJ. This condition became effective on 12/04/2002 for new affected sources and becomes effective on 12/05/2005 for existing affected sources.

#### 40CFR 63-JJJ.3320 (b) (3)

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This condition limits organic HAP emissions to no more than 8% of the mass of coating solids applied each month for all new affected sources, as defined in 40 CFR 63 Subpart JJJJ. This condition also limits organic HAP emissions to no more than 20% of the mass of coating solids applied each month for all existing affected sources, as defined in 40 CFR 63 Subpart JJJJ. This condition became effective on 12/04/2002 for new affected sources and becomes effective on 12/05/2005 for existing affected sources.

40CFR 63-JJJJ.3330 (a)

This condition specifies that all existing affected sources, as defined in 40 CFR 63 Subpart JJJJ, must comply with the provisions of that rule by 12/05/2005.

40CFR 63-JJJJ.3330 (b)

This condition specifies that all new affected sources, as defined in 40 CFR 63 Subpart JJJJ, must comply with the provisions of that rule immediately upon startup or by 12/04/2002, whichever is later.

40CFR 63-JJJJ.3360 (c)

This condition outlines the procedures available to the facility for determining the organic HAP mass fraction of each coating material "as-purchased". One of the methods in this condition must be used to determine compliance with the emission limit specified at 40 CFR 63.3320.

40CFR 63-JJJJ.3360 (d)

This condition outlines the procedures available to the facility for determining the volatile organic content, as a surrogate for the organic HAP content, of each coating material "as-purchased". One of the methods in this condition must be used to determine compliance with the emission limit specified at 40 CFR 63.3320.

40CFR 63-JJJJ.3370 (b)

This condition sets the emission limits a source must meet if the facility chooses to comply by using coating materials that individually meet the emission standards in 40 CFR 63.3320(b)(2) or (3). The limit requires that each coating material applied during the month at an existing affected source contain no more than 0.04 mass fraction of organic HAP or 0.2 kg organic HAP per kg coating solids, on an as-purchased basis. The limit further states that each coating material applied during the month at a new affected source can contain no more than 0.016 mass fraction of organic HAP or 0.08 kg organic HAP per kg coating solids, on an as-purchased basis.

40CFR 63-JJJJ.3370 (c)

This condition sets the compliance demonstration alternatives that a facility must select if it chooses to comply with the the emission standards in 40 CFR 63.3320(b)(2) or (3) for coating materials as-applied.

40CFR 63-JJJJ.3370 (c) (5)

This condition specifies the emission standards for new and existing affected sources choosing to comply with 40 CFR 63.3320(b)(2) or (3).

40CFR 63-JJJJ.3400 (b)

This condition requires the facility to submit the initial notification required by 40 CFR 63.9(b).

40CFR 63-JJJJ.3400 (c) (1)

This condition specifies the schedule the facility must follow for submission of its semiannual compliance

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reports.

40CFR 63-JJJ.3400 (c) (2)

This condition provides detail on what information must be contained in the semiannual compliance report.

40CFR 63-JJJ.3400 (e)

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

40CFR 63-JJJ.3410 (a)

This condition specifies what records must be kept on a monthly basis for all affected sources at the facility.

40CFR 63-KK.820 (b)

This condition makes clear that the provisions of 40 CFR 63 Subpart KK do not apply to research and laboratory equipment.

40CFR 63-KK.821 (a) (2)

This condition defines what sources are considered affected sources for the purposes of 40 CFR 63 Subpart KK.

40CFR 63-KK.821 (a) (3)

This condition specifies under what circumstances the facility owner can elect to include stand-alone coating equipment as an affected source subject to the requirements of 40 CFR 63 Subpart KK.

40CFR 63-KK.821 (c)

This condition states that once a source must comply with the requirements of 40 CFR 63 Subpart KK it has to always comply with the relevant requirements of 40 CFR 63 Subpart KK, regardless of the future status of the source.

40CFR 63-KK.823

This condition references a table to utilize for determining which of the General Provisions in 40 CFR 63 Subpart A apply to sources that have to comply with 40 CFR 63 Subpart KK.

40CFR 63-KK.825 (b)

This condition contains the optional emission standards that apply to the facility. The facility must choose one of the standards to demonstrate compliance with. The condition also list procedures that the facility must use to demonstrate compliance with the emission standards.

40CFR 63-KK.826 (b)

This condition specifies that the compliance date for a new affected source is immediately upon startup of the affected source or May 30, 1996, whichever is later.

40CFR 63-KK.827 (b) (2)

This condition outlines the procedures available to the facility for determining the organic HAP weight

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fraction for each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent and other material applied.

40CFR 63-KK.827 (c) (3)

This condition allows the facility to utilize formulation data and material supplier data to determine the volatile content of the materials that it uses. In the event there is inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR 60 Appendix A, the applicable test method shall govern.

40CFR 63-KK.829 (a)

This condition references Table 1 of 40 CFR 63 Subpart KK as a source for determining what record keeping provisions of 40 CFR 63 Subpart A apply to the facility.

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

This condition what records the facility must maintain on a monthly basis.

40CFR 63-KK.830 (a)

This condition references Table 1 of 40 CFR 63 Subpart KK as a source for determining what reporting provisions of 40 CFR 63 Subpart A apply to the facility.

40CFR 63-KK.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.

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

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

40CFR 63-KK.830 (b) (6)

This condition requires the facility to submit a semiannual Summary Report as specified in 40 CFR

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63.10(e)(3) and a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i). The summary report shall include any exceedances of the standards in 40 CFR 63.824 & 825.

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

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

6NYCRR 201-7

This regulation requires federally-enforceable terms and conditions to be incorporated into a permit that will limit emissions below those requiring a Title V facility permit or compliance with a specific applicable requirement.

6NYCRR 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 a particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212.5 (d)

This section specifies that if best available control technologies are implemented the commissioner may specify, under certain situations, a less restrictive emission rate.

6NYCRR 212.6 (a)

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

6NYCRR 217-3.3

This condition outlines under what circumstances the idling of diesel powered vehicles is allowed on the plant property.

6NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8

This regulation requires an owner or operator of a facility which purchases and fires coal and/or oil to submit reports to the commissioner containing fuel analysis data, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1.

6NYCRR 227.2 (b) (1)

This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired

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stationary combustion installation.

6NYCRR 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.

6NYCRR 227-1.6 (a)

This regulation requires that any facility found in violation of the provisions of Part 227 must not operate the affected stationary combustion installation that is in violation unless it is equipped with approved emission control equipment, it is rehabilitated or upgraded in an approved manner; or the fuel is changed to an acceptable type

6NYCRR 227-1.6 (b)

This regulation states that the Department may seal the affected stationary combustion installation that does not comply with the provisions in subdivision 6 NYCRR 227-1.6(a) within the time provided.

6NYCRR 227-1.6 (c)

This regulation state that no person may operate any affected stationary combustion installation sealed by the commissioner in accordance with this Part 227.

6NYCRR 227-1.6 (d)

This regulation states that no person except Department personnel may remove, tamper with, or destroy any seal affixed to any affected stationary combustion installation.

6NYCRR 228 .1 (e) (13)

This condition states that low-use surface coatings used for intermittent or specialty-type operations, where the combined facility-wide total usage is 55 gallons or less on a twelve month rolling basis, are not subject to the requirements of 6 NYCRR Part 228. The facility must maintain records of such coatings to demonstrate they qualify for this exemption.

6NYCRR 228 .10

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

6NYCRR 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.

6NYCRR 228 .5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or

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production records of the coating material, including solvents and any additional information required to determine compliance with Part 228, to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6NYCRR 228 .5 (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.

6NYCRR 228 .5 (c)

This citation allows alternate sampling and analysis methods to be used, subject to the approval of the Department and the Administrator.

6NYCRR 228 .5 (d)

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

6NYCRR 228 .5 (j)

This requires any information or record showing noncompliance with the requirements of Part 228 to be reported to Department within 30 days of generation of the information or record..

6NYCRR 228 .5 (k)

This requires all records required by this regulation to be maintained at the facility for a period of five years

6NYCRR 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.

6NYCRR 231-2.2 (a) (4)

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

The 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.

6NYCRR 234 .3 (a) (1)

Any owner or operator of a packaging rotogravure, publication rotogravure, or flexographic printing process

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employing ink containing volatile organic compounds shall ensure that the volatile fraction of ink, as it is applied to the substrate, contains 25.0 percent by volume or less of volatile organic compounds and 75.0 percent by volume of nonreactive volatiles. The formulas used to calculate the concentration of volatile organic compounds in an ink are set forth in Section 234.3(a)(1).

6NYCRR 234 .3 (a) (2)

An owner or operator of a packaging rotogravure, publication rotogravure, or flexographic process employing ink containing volatile organic compounds shall ensure that the ink as it is applied to the substrate, less nonreactive volatiles, contains 60.0 percent by volume or more of nonvolatile material. The formulas used to make this determination are set forth in section 234.3(a)(2).

6NYCRR 234 .3 (c)

The maximum concentration of volatile organic compounds (VOCs), minus water and excluded VOCs, of inks/coatings or adhesives used in the following screen printing processes is 3.3 pounds/gallon:

- paper - glass
- metal - plastic/vinyl
- reflective sheeting
- textile/imprinted garments
- pressure sensitive decals
- wood/plywood

The maximum concentration of VOCs, minus water and excluded VOCs, of inks/coatings or adhesives used in Serigraph/fine arts screen printing processes is 5.0 pounds/gallon.

6NYCRR 234 .3 (e)

The emissions to the outdoor atmosphere may not exceed an average opacity greater than 10% for any consecutive six-minute period from any emission source subject to Part 234.

6NYCRR 234 .3 (f) (1)

Printing processes may be operated with a lesser degree of control than is required per Part 234 provided that a reasonably available control technology (RACT) proposal acceptable to the DEC is submitted by the facility. Such a proposal must be submitted in a permit application, and would be subject to public review and comment. In addition, the proposal would be submitted to the United States Environmental Protection Agency as a revision to the New York State Implementation Plan.

6NYCRR 234 .4 (b) (2)

The United States Environmental Protection Agency has approved test methods for determining the concentration of volatile organic compounds, water content, and solids content of inks and coatings (see 40 CFR 60, Appendix A). The facility must use either Methods 24 or 24A or obtain the composition

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of the ink solvent/volatiles from the manufacturer.

6NYCRR 234 .4 (b) (3)

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

6NYCRR 234 .4 (b) (4)

The facility must supply the DEC with the results of any analysis or procedure used for establishing compliance with the requirements of Part 234. These results must be submitted semi-annually at a minimum. In addition, representatives of the DEC may obtain samples of inks or fountain solutions during normal business hours in order to determine whether the facility is in compliance with the requirements of Part 234.

6NYCRR 234 .5 (a)

It is prohibited to sell, specify, or require for use a non-compliant ink or coating unless a process-specific variance from the requirements of Part 234 has been granted by the DEC or where control equipment is used to comply with the requirements of Part 234.

6NYCRR 234 .6

This requirement pertains to general provisions for the handling, storage and disposal of volatile organic compounds and applies to open containers except where production, sampling, maintenance or inspection procedures require operation access; and to actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

**Compliance Certification**

Summary of monitoring activities at FIBERMARK NORTH AMERICA INC:

<b>Location</b>	<b>Type of Monitoring</b>	<b>Cond No.</b>
<b>Facility/EU/EP/Process/ES</b>		
FACILITY	work practice involving specific operations	60
FACILITY	work practice involving specific operations	61
FACILITY	record keeping/maintenance procedures	64
FACILITY	record keeping/maintenance procedures	65
FACILITY	work practice involving specific operations	66
FACILITY	record keeping/maintenance procedures	67
FACILITY	work practice involving specific operations	68
FACILITY	record keeping/maintenance procedures	69
FACILITY	record keeping/maintenance procedures	70
FACILITY	record keeping/maintenance procedures	71
FACILITY	record keeping/maintenance procedures	72
FACILITY	record keeping/maintenance procedures	73



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FACILITY	record keeping/maintenance procedures	49
FACILITY	work practice involving specific operations	51
FACILITY	record keeping/maintenance procedures	52
FACILITY	record keeping/maintenance procedures	54
FACILITY	record keeping/maintenance procedures	56
FACILITY	record keeping/maintenance procedures	57
FACILITY	record keeping/maintenance procedures	58
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	monitoring of process or control device parameters as surrogate	25
0-00001/-/011	monitoring of process or control device parameters as surrogate	81
0-00005	monitoring of process or control device parameters as surrogate	91
FACILITY	record keeping/maintenance procedures	7
FACILITY	intermittent emission testing	26
FACILITY	record keeping/maintenance procedures	27
FACILITY	work practice involving specific operations	28
FACILITY	record keeping/maintenance procedures	29
0-00001/-/011	intermittent emission testing	82
FACILITY	monitoring of process or control device parameters as surrogate	30
FACILITY	record keeping/maintenance procedures	31
FACILITY	record keeping/maintenance procedures	40
FACILITY	monitoring of process or control device parameters as surrogate	32
FACILITY	record keeping/maintenance procedures	33
FACILITY	record keeping/maintenance procedures	34
FACILITY	record keeping/maintenance procedures	35
FACILITY	record keeping/maintenance procedures	37
FACILITY	record keeping/maintenance procedures	38
FACILITY	work practice involving specific operations	39
0-00002/-/024	work practice involving specific operations	83
0-00005/-/034	work practice involving specific operations	92
0-00002/-/024	work practice involving specific operations	84
0-00005/-/034	work practice involving specific operations	93
FACILITY	monitoring of process or control device parameters as surrogate	41
0-00002/-/024	record keeping/maintenance procedures	86
0-00005/-/034	record keeping/maintenance procedures	95
FACILITY	record keeping/maintenance procedures	42
FACILITY	record keeping/maintenance procedures	43

**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

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unit 0-00005 was installed in March 2003 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.

In 1982 the facility installed a boiler capable of firing #6 fuel oil. The facility has accepted a limit on the heat input of BLR01, a sulfur content of 1.0% for #6 fuel oil burned in BLR01, and is also restricted from firing #6 fuel oil in BLR02. These limits were taken in order to continue to avoid becoming a major source of sulfur dioxide under Federal Prevention of Significant Deterioration Regulations (40 CFR 52.21).

This facility emits formaldehyde which has been given an A rating in accordance with the provisions of 6 NYCRR Part 212. All 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. The facility has accepted an annual emission limit of formaldehyde at 2955 pounds. This emission level ensures that the facility will not exceed the ambient guideline concentrations in DAR-1.

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(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 processes 028 of emission unit 0-00002, process 031 of emission unit 0-00003, and processes 033 & 034 of emission unit 0-00005. 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.

6) 6 NYCRR Part 225-1.2(a)(2): This facility has one boiler capable of burning #6 fuel oil (emission unit 0-00001, process 011, emission source BLR01). All #6 fuel oil burned in this boiler must contain 1.0% sulfur by weight, or less.

7) 6 NYCRR Part 225-1.8: Any facility that burns fuel oil must maintain records of the quantity and physical characteristics of that fuel oil.

8) 6 NYCRR Part 227.2(b)(1): This facility fires one stationary combustion installation on oil (emission unit 0-00001, process 011, emission source BLR01) and is thus required to maintain a particulate emission level of less than 0.10 pounds per million Btu from each stationary combustion installation.

9) 6 NYCRR Part 227-1.3(a): Emission unit 0-00001, emission sources BLR01 & BLR02 meet 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.

10) 6 NYCRR Part 228.1(d); 228.2; 228.4; 228.5(a), (b), (c), (d), (f), (j) & (k); 228.6(a); 228.7 and 228.10: This facility has a VOC PTE > 10 tpy and coats paper at emission unit 0-00002, processes 021 & 026 and emission unit 0-00005, process 030. The facility also prepares and handles surface coatings at various processes in emission units 0-00002, 0-00003 & 0-00005. Therefore, the VOC RACT requirements and all other emission limits, monitoring, recordkeeping and reporting requirements of 6

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NYCRR Part 228 apply to these emission units' paper coating operations.

11) 6 NYCRR Part 228.1(e)(13): This facility can consider certain surface coatings as low-use coatings as long as the combined facility-wide usage is 55 gallons or less during any 12 month period. The facility must maintain records to demonstrate compliance with this option.

12) 6 NYCRR Part 234.3(a)(1), (a)(2), (c), (e) & (f)(1); 234.4(b)(3) and 234.6: This facility has a VOC PTE > 50 tpy and applies ink to substrates at emission unit 0-00002, process 024 and emission unit 0-00005, process 034. Therefore, the VOC RACT requirements and all other limits, monitoring, record keeping and reporting requirements of 6 NYCRR Part 234 apply to these emission units' printing operations.

13) 40 CFR 63.825(b); 63.827(b)(2) & (c)(3); 63.829(b)(1) and 63.830(b)(1), (b)(3) & (b)(6): This facility is a major source of HAP that includes affected sources (emission unit 0-00002, process 024 & emission unit 0-00005, process 034) as defined by 40 CFR Part 63, Subpart KK. Therefore, these processes must comply with the HAP control, monitoring, record keeping and reporting requirements of the rule that apply to sources using compliant inks as their compliance option.

14) 40 CFR Part 63.3320(b)(2) & (b)(3); 63.3360(c) & (d); 63.3370(b), (c), (c)(5), (d) & (l); 63.3400(b), (c)(1), (c)(2) & (e) and 63.3410(a): This facility is a major source of hazardous air pollutants (HAP) that includes affected sources (emission unit 0-00002, processes 021, 022 & 026 and emission unit 0-00005, process 030) as defined by 40 CFR Part 63, Subpart JJJJ. Therefore, these processes must comply with the HAP control, monitoring, record keeping and reporting requirements of the rule that apply to sources using compliant coatings as their compliance option. Emission unit 0-00002, process 026 and emission unit 0-00005, process 030 must already be in compliance. The compliance deadline for emission unit 0-00002, processes 021 & 022 is December 5, 2005.