



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

Facility Identification Data

Name: INTERNATIONAL IMAGING

Address: 310 COMMERCE DR

AMHERST, NY 14228

Owner/Firm

Name: INTERNATIONAL IMAGING MATERIALS INC

Address: 310 COMMERCE DR

AMHERST, NY 14228-2303, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: LISA M CZECHOWICZ

Address: NYSDEC - REGION 9

270 MICHIGAN AVE

BUFFALO, NY 14203-2915

Phone:7168512165

Division of Air Resources:

Name: CHERYL WEBSTER

Address: NYSDEC - REGION 9

270 MICHIGAN AVE

BUFFALO, NY 14203-2915

Air Permitting Contact:

Name: JEFFREY A WITTLINGER

Address: INTERNATIONAL IMAGING

310 COMMERCE DR

BUFFALO, NY 14228

Phone:7166916333

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

INTERNATIONAL IMAGING is located in the town of AMHERST in the county of ERIE.



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

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

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:

IIMAK is a manufacturer of thermal transfer ribbons. IIMAK coats polyester film with wax and solvent-based backings and inks for use in bar code applicators, color printers, and facsimile machines. In order to manufacture these products, solvent-based coatings are manufactured and applied to the film using coating machines.

There are three coating lines at the facility: Two coating lines within Plant No. 1 whose emissions are routed to Oxidizer 4, and a third coating line consisting of five (5) coating machines and a solvent cleaning process within Plant No. 2 whose emissions are routed to either Oxidizer 4 or the Toluene Recovery System (TRS). The TRS is used as an alternate emission control for Plant 2 emissions specifically from toluene coating stations. Oxidizer 4 is the backup to the TRS, and the backup for Oxidizer 4 within Plant 2 is Oxidizer 3. The backup to Oxidizer 4, for Plant 1 emissions, is Oxidizer No. 2.

Permit Structure and Description of Operations

The Title V permit for INTERNATIONAL IMAGING

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

that is not included in the above categories.

INTERNATIONAL IMAGING is defined by the following emission unit(s):

Emission unit 1CORON - Polyester film is subjected to a corona treatment process that generates ozone. The corona treatment units are connected to coating machines MSC-1, MSC-2, 89-2, and 89-3. The ozone is collected in hoods and vented to the roofs of Plant No. 1 & Plant No. 2 in 0.667 foot diameter pipes at 1500 CFM.

Emission unit 1CORON is associated with the following emission points (EP):
00028, 00029, 00030

Process: CR1 is located at Building 2 - This process consists of two corona treatment units that are connected to the MSC-1 and MSC-2 coating machines. The corona treatment units use an electrical process that pretreats the film and generates ozone as a byproduct. The ozone is collected in a hood and vented to a stack on the Plant No. 2 roof.

Process: CR2 is located at Main floor, Building 2 - Process consists of two corona treatment units that are connected to the MSC-3 and MSC-4 coating machines. The units are electrical processes that pretreat the film and generate ozone. The ozone is collected in hoods and vented to a stack on the Plant No. 2 roof.

Process: CR3 is located at Main Floor, Building 1 - Process consists of two corona treatment units that are connected to the 89-2 and 89-3 coating machines. The corona treatment unit use an electrical process that pre-treats the film and generates ozone. The ozone is collected in hoods and vented to a stack on the Plant No. 1 roof.

Emission unit 1WEIGH - A mixture of solid pigment resins and waxes are weighed at weigh stations and are then mixed and melted at the mix tanks. Dust from the weighing process is collected into dust collectors.

Emission unit 1WEIGH is associated with the following emission points (EP):
00018, 00019

Process: W01 is located at main floor, Building 1 - A mixture of solid pigment resins and waxes are weighed at weigh stations and are then mixed and melted at the mix tanks. Dust from the weighing process is collected into dust collectors.

Emission unit XOXDZR - This emission unit includes all coating machines, parts washers, slitting machines, oxidizers, and the toluene recovery system (TRS) located within Plant 1 and Plant 2. Emissions from Plant 1 are routed to Oxidizer 4 with Oxidizer 2 as the backup unit, and emissions from Plant 2 sources are routed to either Oxidizer 4 or the TRS, with Oxidizer 3 as the backup unit. The TRS has the capability to receive and treat approximately half of the facility-wide emissions.

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

Process: OXA is located at Building 1 - This process involves the venting of all air emissions from the coating and slitting machines in Plant 1 to Oxidizer #4 or Oxidizer #2, which serves as the backup unit.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

Process: OXB is located at Building 2 - This process involves the venting of air emissions from the coating machines and parts washers in Plant 2 to Oxidizer #4 or Oxidizer #3, which serves as the backup unit.

Process: TRS is located at Main Floor, Building 2 - This process consists of a Toluene Recovery System (TRS) which removes solvent from the emissions from the MSC coating machines through a carbon adsorption system and returns it to the process. Oxidizers 3 & 4 will serve as backups to the TRS system.

Emission unit 1CBS01 -

Process: T01 is located at OUTSIDE BUILDING, Building 2 -

Emission unit 1BOILR - Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.

Emission unit 1BOILR is associated with the following emission points (EP):
00020, 00021

Process: B20 is located at MAIN FLOOR, Building 2 - Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.

Process: B21 is located at MAIN FLOOR, Building 2 - Natural gas boilers produce steam which is hard-piped to various coaters and ink mixing units for heating and drying.

Title V/Major Source Status

INTERNATIONAL IMAGING is subject to Title V requirements. This determination is based on the following information:

International Imaging Inc. (IIMAK) has the potential-to-emit several air contaminants (see below) at rates greater than the major source thresholds as defined by Title V of the Clean Air Act Amendments of 1990, making the facility a major source and requiring the issuance of this Air Title V permit.

The specific contaminants and the major source threshold for each are:

Volatile Organic Compounds (VOC) - 50 tons per year
Total Hazardous Air Pollutants (HAP) - 25 tons per year
Toluene - 10 tons per year
Methyl Ethyl Ketone - 10 tons per year

Program Applicability

The following chart summarizes the applicability of INTERNATIONAL IMAGING with regards to the principal air pollution regulatory programs:



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035
Renewal Number: 2
10/27/2016

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, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

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

SIC Code

Description

3955

CARBON PAPER AND INKED RIBBONS

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

1-03-006-02

EXTERNAL COMBUSTION BOILERS -
 COMMERCIAL/ INDUSTRIAL
 COMMERCIAL/INSTITUTIONAL BOILER - NATURAL
 GAS
 10-100 MMBtu/Hr

3-15-010-01

PHOTOGRAPHIC EQUIPMENT
 PHOTOCOPYING EQUIPMENT MANUFACTURING
 Resin Transfer/Storage

3-16-050-03

PHOTOGRAPHIC PRODUCT MANUFACTURING
 SURFACE TREATMENTS

3-90-006-89

CORONA DISCHARGE TREATMENT
 IN-PROCESS FUEL USE
 INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE
 General

4-05-007-01

PRINTING/PUBLISHING
 PRINTING/PUBLISHING - GENERAL



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

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

Solvent Storage: General

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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000630-08-0	CARBON MONOXIDE				
064742-47-8	DISTILLATES (PETROLEUM), HYDROTREATED LIGHT				
068476-39-1	HYDROCARBONS, ALIPH-AROM-C4-5 OLEFINIC				
000067-63-0	ISOPROPYL ALCOHOL				
000067-56-1	METHYL ALCOHOL				
000078-93-3	METHYL ETHYL KETONE				
0NY210-00-0	OXIDES OF NITROGEN				
010028-15-6	OZONE				
0NY075-00-0	PARTICULATES				
007446-09-5	SULFUR DIOXIDE				
000108-88-3	TOLUENE				
0NY100-00-0	TOTAL HAP				
0NY998-00-0	VOC	352000			
001330-20-7	XYLENE, M, O & P MIXT.				

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
 - (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
 - (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)

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

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)

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

Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)

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

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

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

Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)

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

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

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

Item K: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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

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

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

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

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	54	Powers and Duties of the Department with respect to air pollution control
1-BOILR	40CFR 60-Dc.48c (a)	34	Reporting and Recordkeeping Requirements.
1-BOILR	40CFR 60-Dc.48c (g)	35	Reporting and Recordkeeping Requirements.
1-BOILR	40CFR 60-Dc.48c (g) (2)	36	Alternative recordkeeping
1-BOILR	40CFR 60-Dc.48c (g) (3)	37	Reporting and Recordkeeping Requirements.
X-OXDZR	40CFR 64	53	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	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	55	Unavoidable noncompliance and



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

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

X-OXDZR	6NYCRR 201-1.4	56	violations Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 31, 32	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201- 6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7.1	23	Emission Capping in Facility Permits
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	29	General Prohibitions - air pollution prohibited
1-WEIGH	6NYCRR 212-1.6(a)	39	Limiting of Opacity
1-CORON	6NYCRR 212-2.3(a)	38	Criteria air contaminants applicable to Table 3
1-WEIGH	6NYCRR 212-2.4(b)	40	Control of Particulate from New and Modified Process Emission Sources
X-OXDZR	6NYCRR 212- 3.1(c)(4)(i)	41	RACT compliance plan control limits for Capture and Control
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions



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

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

1-BOILR	6NYCRR 227-1.3(a)	33	Smoke Emission Limitations.
X-OXDZR	6NYCRR 228-1.3(a)	42	Surface Coating
X-OXDZR	6NYCRR 228-1.3(b)(1)	43	General Requirements- Opacity
X-OXDZR	6NYCRR 228-1.3(c)	44	General Requirements - Record Keeping
X-OXDZR	6NYCRR 228-1.3(d)	45	Surface Coating General Requirements- Prohibitions
X-OXDZR	6NYCRR 228-1.4(d)	46	Surface Coating General Requirements- Handling, storage and disposal
X-OXDZR	6NYCRR 228-1.5(c)	47, 48, 49, 50	Class D Coating Lines Calculation of overall removal efficiency of an air cleaning device
FACILITY	6NYCRR 228-1.6(d)	30	Surface coating control equipment test methods
X-OXDZR	6NYCRR 228-1.6(f)(1)	51	monitoring
X-OXDZR	6NYCRR 228-1.6(f)(3)	52	incineration controls monitoring of carbon adsorption unit

Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

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 201-6.4 (a) (4)

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

6 NYCRR 201-6.4 (a) (7)

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

6 NYCRR 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

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

6 NYCRR 201-6.4 (c) (3) (ii)

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

6 NYCRR 201-6.4 (d) (5)

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

6 NYCRR 201-6.4 (e)

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

6 NYCRR 201-6.4 (f) (6)

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

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

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, INTERNATIONAL IMAGING has been determined to be subject to the following regulations:

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 (g) (2)

This regulation allows the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

40 CFR 60.48c (g) (3)

This condition states the recordkeeping requirements for facilities only combusting fuels that do not have an emission standard

40 CFR Part 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6 NYCRR 201-7.1

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6 NYCRR 211.1

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

6 NYCRR 212-1.6 (a)

This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.3 (a)

Table 3 of 212-2.3 describes the reduction in emissions required for a criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of controlled applied.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

6 NYCRR 212-3.1 (c) (4) (i)

This provision states that owners and/or operators of emission points subject to Part 212-3 operating prior to October 20, 1994 must submit a compliance plan to the department. The compliance plan must demonstrate that the VOC emission points are equipped with a capture system and a control device with an overall removal efficiency of at least 81 percent.

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 228-1.3 (a)

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

6 NYCRR 228-1.3 (b) (1)

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

6 NYCRR 228-1.3 (c)

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

6 NYCRR 228-1.3 (d)

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



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

6 NYCRR 228-1.4 (d)

6 NYCRR 228-1.5 (c)

6 NYCRR 228-1.6 (d)

6 NYCRR 228-1.6 (f) (1)

6 NYCRR 228-1.6 (f) (3)

Compliance Certification

Summary of monitoring activities at INTERNATIONAL IMAGING:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
1-BOILR	34	record keeping/maintenance procedures
1-BOILR	35	record keeping/maintenance procedures
X-OXDZR	53	record keeping/maintenance procedures
X-OXDZR	56	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	25	work practice involving specific operations
FACILITY	26	work practice involving specific operations
FACILITY	27	work practice involving specific operations
FACILITY	28	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
1-WEIGH	39	monitoring of process or control device parameters as surrogate
1-CORON	38	record keeping/maintenance procedures
1-WEIGH	40	monitoring of process or control device parameters as surrogate
X-OXDZR	41	record keeping/maintenance procedures
1-BOILR	33	monitoring of process or control device parameters as surrogate
X-OXDZR	42	monitoring of process or control device parameters



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

		as surrogate
X-OXDZR	43	record keeping/maintenance procedures
X-OXDZR	44	record keeping/maintenance procedures
X-OXDZR	45	record keeping/maintenance procedures
X-OXDZR	46	record keeping/maintenance procedures
X-OXDZR	47	record keeping/maintenance procedures
X-OXDZR	48	record keeping/maintenance procedures
X-OXDZR	49	intermittent emission testing
X-OXDZR	50	intermittent emission testing
FACILITY	30	record keeping/maintenance procedures
X-OXDZR	51	record keeping/maintenance procedures
X-OXDZR	52	record keeping/maintenance procedures

Basis for Monitoring

Most of the monitoring requirements contained in this permit are based on specific monitoring methods and observations as prescribed in the applicable rules. Facility specific monitoring conditions were written to assure that reliable information is obtained representing the facility's compliance status.

Condition 56 – 6 NYCRR Part 201-1.4 – This condition details the actions the facility will follow according to their Startup Shutdown Malfunction (SSM) Plan in case of control technology (oxidizer or toluene recovery system (TRS)) malfunction.

Conditions 24, 25, 26, 27, & 28 – 6 NYCRR Part 201-7.1 – These conditions detail the four separate VOC emission caps for different portions of the facility. These conditions are necessary to document the specific emission sources subject to each cap and to detail the required methods of record keeping and reporting. The facility is required to maintain monthly records and to submit an annual certification verifying compliance with the limits.

Conditions 39 & 40 – 6 NYCRR Part 212-1.6(a) & Part 212-2.4(b) - These conditions limit the opacity and particulate loading of the emissions the pigment weigh station (emission unit 1-WEIGH).

Condition 38 – 6 NYCRR Part 212-2.3(a) – This condition details the analysis of potential impact from ozone emissions generated by corona treatment units.

Condition 41 – 6 NYCRR Part 212-3.1(c)(4)(i) – This condition states that the facility is also subject to more stringent volatile organic compound (VOC) removal efficiency requirements (90%) per 6 NYCRR Part 228-1 than required by the with Reasonably Available Control Technology requirements (81%) of 6 NYCRR Part 212-3.

Condition 33 – 6 NYCRR Part 227-1.3(a) – This condition limits the opacity and particulate loading of the emissions from the boilers (emission unit 1-BOILR).



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

Condition 42 – 6 NYCRR Part 228-1.3(a) – This conditions limits the opacity from emission points associated with coating machines and their control equipment; monthly visible emission observations are required.

Condition 43 – 6 NYCRR Part 228-1.3(b)(1) – This condition details recordkeeping requirements and the requirement to obtain certification from the coating supplier/manufacturer containing specific volatile organic compound (VOC) content information for each coating. The condition is necessary to specify the information which must be obtained and retained.

Condition 44 – 6 NYCRR Part 228-1.3(c) – This condition contains a prohibition of the use of coatings specifically not allowed in other provisions of the regulation.

Condition 45 – 6 NYCRR Part 228-1.3(d) – This condition contains many standards for work practices at facilities which perform coating operations. These standards cover the handling, storage, and disposal of VOCs.

Condition 46 – 6 NYCRR Part 228-1.4(d) – This condition contains the as-applied VOC limit for coatings used in Class D coating lines, specifically in this case for pressure sensitive tape and label surface coating operations.

Condition 47 – 6 NYCRR Part 228-1.5(c) – This condition requires the performance of annual preventative maintenance on the control device which is termed the toluene recovery system.

Condition 48 – 6 NYCRR Part 228-1.5(c) – This condition details the requirement to maintain permanent total enclosures around each coating machine to maximize the overall removal efficiency of each oxidizer. It is necessary to provide the specific standards for assessing compliance.

Condition 49 – 6 NYCRR Part 228-1.5(c) – This condition defines the various monitoring and testing measures which will indicate compliance with the minimum overall VOC removal efficiency rate of 90% for the toluene recovery system. The system must undergo performance testing within 180 days of permit issuance and subsequently once every five years.

Condition 50 – 6 NYCRR Part 228-1.5(c) – This condition defines the various monitoring and testing measures which will indicate compliance with the minimum overall VOC removal efficiency rate of 90% for the oxidizers. The oxidizers must undergo performance testing within 180 days of permit issuance and subsequently once every five years.



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 9-1422-00093/00035

Renewal Number: 2

10/27/2016

Condition 30 – 6 NYCRR Part 228-1.6(d) – This condition defines the methods which are acceptable for determining the overall removal efficiency during performance testing.

Condition 51 – 6 NYCRR Part 228-1.6(f)(1) - This condition defines the manner in which overall VOC removal efficiencies will be determined for the oxidizers, how minimum operating temperatures will be assured, and how operating temperature/destruction efficiency associations will be used in emission calculations.

Condition 52 – 6 NYCRR Part 228-1.6(f)(3) – This condition defines the record keeping, maintenance, and calibration procedures for the toluene recovery system to assure that the system properly controls emissions, breakthrough of the carbon beds within the system does not occur, and at least the minimum amount of data points are collected, recorded, and used to determine outlet concentrations.

Conditions 34 & 35 – 40 CFR 60.48c Subpart Dc – These conditions detail the requirements for the facility's two 24.5 mmBTU/hr natural gas boilers per this New Source Performance Standard (NSPS). The facility must maintain records of the amount of fuels combusted during each calendar month and must submit notification if the source is reconstructed.

Condition 53 – 40 CFR Part 64 – This condition details the facility's Compliance Assurance Monitoring (CAM) Plans for the control equipment (oxidizers and toluene recovery system) which are used to reduce VOC emissions.