

Facility DEC ID: 1472804190

**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 1-4728-04190/00004  
Mod 0 Effective Date: 03/17/2021 Expiration Date: 03/16/2026  
Mod 1 Effective Date: 08/12/2021 Expiration Date: 03/16/2026  
Mod 2 Effective Date: 06/06/2022 Expiration Date: 03/16/2026

Permit Issued To:AMCOR FLEXIBLES NORTH AMERICA INC  
2200 BADGER AVE  
OSHKOSH, WI 54904

Contact: ANTHONY OAKES  
AMCOR FLEXIBLES NORTH AMERICA  
100 WILSHIRE BLVD  
EDGEWOOD, NY 11717  
(631) 794-2985

Facility: AMCOR FLEXIBLES NORTH AMERICA INC  
100 WILSHIRE BLVD  
EDGEWOOD, NY 11717

Contact: PAIGE MAAKE  
Amcor Flexibles North America  
100 Wilshire Blvd  
Edgewood, NY 11717  
(631) 794-2911

Description:

This is a modification of The Title V permit, which reflects the installation and operation of three (3) seamers and two (2) corona treaters. Both the corona treaters will be used with the UV printing press.

Amcor Flexibles North America Inc. operates a facility in Edgewood, Town of Islip, for the manufacturing of labels for consumer and industrial products. The Edgewood facility already contains provisions for four central-impression (CI) flexographic printing lines, two ink jet printing units, a flexographic plate-making process (all identified under the grouping of Emission Unit 1-PRINT), and a seamer. As stated above, the facility is installing two corona treaters and three additional seamers.

Volatile Organic Compound (VOC) emissions generated from solvent based printing operations are captured and controlled through the use of Permanent Total Enclosure technology (meeting criteria for 100% VOC capture efficiency) and the use of two (2) regenerative thermal oxidizers (RTOs). The oxidizers will be operated to perform with

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minimum VOC destruction efficiencies of 98%. A catalytic oxidizer operates as a backup to be used if one of the RTOs is out of service.

Applicable Federally enforceable annual emission limits are 60 tons per year (tpy) of VOC, 22.5 tpy of nitrogen oxides (NOx), 22.5 tpy of hazardous air pollutants (HAPs), and 9 tpy of any individual HAP. These limits were established to meet major nonattainment area new source review requirements, and to establish area source status for HAP emissions.

Monthly and rolling 12-month net VOC throughput and fuel consumption records and emissions calculations will be maintained by Amcor to show compliance with the emission limits.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: SHERRI L AICHER  
NYSDEC - REGION 1 SUNY @ STONY BROOK  
50 CIRCLE RD  
STONY BROOK, NY 11790-3409

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_

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**Notification of Other State Permittee Obligations**

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

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**DEC GENERAL CONDITIONS**

\*\*\*\* General Provisions \*\*\*\*

**For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.**

**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

**Item 1.2:**

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

**Item 1.3:**

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**

**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

**Item 3.2:**

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

**Item 3.3**

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be

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submitted prior to actual transfer of ownership.

**Condition 4: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of application for permit modification or renewal - REGION 1**

**HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator  
Region 1 Headquarters  
Division of Environmental Permits  
Stony Brook University  
50 Circle Road  
Stony Brook, NY 11790-3409  
(631) 444-0365

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**Permit Under the Environmental Conservation Law (ECL)**

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:AMCOR FLEXIBLES NORTH AMERICA INC  
2200 BADGER AVE  
OSHKOSH, WI 54904

Facility:           AMCOR FLEXIBLES NORTH AMERICA INC  
100 WILSHIRE BLVD  
EDGEWOOD, NY 11717

Authorized Activity By Standard Industrial Classification Code:  
2671 - PAPER COATED AND LAMINATED PACKAGING  
2759 - COMMERCIAL PRINTING, NEC

Mod 0 Permit Effective Date: 03/17/2021

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Mod 1 Permit Effective Date: 08/12/2021

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Mod 2 Permit Effective Date: 06/06/2022

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- 44 46 6 NYCRR 201-6.5 (a): CLCPA Applicability
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\*\*\*\* Facility Level \*\*\*\*

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

**Item A: 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 B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 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 C: Certification by a Responsible Official - 6 NYCRR 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 D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)**

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

**Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 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

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reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

**Item F: 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 G: 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 H: Severability - 6 NYCRR 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 I: Permit Shield - 6 NYCRR 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

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facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

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

**Item J: Reopening for Cause - 6 NYCRR 201-6.4 (i)**

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of 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 the 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 section 201- 6.6 of this Subpart.

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

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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**Item K: 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 L: 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.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.**

**Condition 1: Acceptable Ambient Air Quality  
Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement: 6 NYCRR 200.6****Item 1.1:**

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where

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contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Condition 2: Fees**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)**

**Item 2.1:**

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

**Condition 3: Recordkeeping and Reporting of Compliance Monitoring**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (c)**

**Item 3.1:**

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii)The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

**Condition 4: Records of Monitoring, Sampling, and Measurement**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (2)**

**Item 4.1:**

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all

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reports required by the permit.

**Condition 5: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)**

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements,

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the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual



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report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2021.  
Subsequent reports are due every 6 calendar month(s).

**Condition 6: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)**

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as

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specified in any special permit terms or conditions;  
and  
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Air Compliance Branch  
USEPA Region 2 DECA/ACB  
290 Broadway, 21st Floor  
New York, NY 10007

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
NYSDEC- Region 1 Headquarters  
Stony Brook University  
50 Circle Road  
Stony Brook, NY 11790-3409

The address for the BQA is as follows:

NYSDEC

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Bureau of Quality Assurance  
 625 Broadway  
 Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2022.  
 Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
 Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:6 NYCRR 202-2.1**

**Item 7.1:**  
 The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 0 days after the reporting period.  
 The initial report is due 4/15/2022.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 8: Recordkeeping requirements**  
 Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:6 NYCRR 202-2.5**

- Item 8.1:**
- (a) The following records shall be maintained for at least five years:
    - (1) a copy of each emission statement submitted to the department; and
    - (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.
  - (b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

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**Condition 9: Open Fires - Prohibitions**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement: 6 NYCRR 215.2**

**Item 9.1:**

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

**Item 9.2**

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.**

**[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]**

**Condition 10: Maintenance of Equipment**  
Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 10.1:**

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

**Condition 11: Recycling and Salvage**  
Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:6 NYCRR 201-1.7**

**Item 11.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air**

Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:6 NYCRR 201-1.8**

**Item 12.1:**

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

**Condition 13: Exempt Sources - Proof of Eligibility**  
Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:6 NYCRR 201-3.2 (a)**

**Item 13.1:**

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The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

**Condition 14: Trivial Sources - Proof of Eligibility**  
Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:6 NYCRR 201-3.3 (a)**

**Item 14.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

**Condition 15: Requirement to Provide Information**  
Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)**

**Item 15.1:**

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

**Condition 16: Right to Inspect**  
Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)**

**Item 16.1:**

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit;

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and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Condition 17: Off Permit Changes**

Effective between the dates of 03/17/2021 and 03/16/2026

Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)

**Item 17.1:**

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

**Condition 18: Required Emissions Tests**

Effective between the dates of 03/17/2021 and 03/16/2026

Applicable Federal Requirement:6 NYCRR 202-1.1

**Item 18.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

**Condition 19: Accidental release provisions.**

Effective between the dates of 03/17/2021 and 03/16/2026

Applicable Federal Requirement:40 CFR Part 68

**Item 19.1:**

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If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
  - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
  - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center  
 C/O CSC  
 8400 Corporate Dr  
 Carrollton, Md. 20785

**Condition 20: Recycling and Emissions Reduction**  
 Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:40CFR 82, Subpart F**

**Item 20.1:**  
 The permittee shall comply with all applicable provisions of 40 CFR Part 82.

**The following conditions are subject to annual compliance certification requirements for Title V permits only.**

**Condition 21: Emission Unit Definition**  
 Effective between the dates of 03/17/2021 and 03/16/2026

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 21.1(From Mod 2):**  
 The facility is authorized to perform regulated processes under this permit for:  
 Emission Unit: 1-CRNA1  
 Emission Unit Description:

The Emission Unit consists of Corona Treater #1 and Corona Treater #2. Will exhaust outside the building without emission control.

Building(s): PLANT

**Item 21.2(From Mod 2):**



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The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-SEAM1

Emission Unit Description:

Four (4) Seamers using solvent adhesive.

Will exhaust inside building without emission control.

Building(s): PLANT

**Item 21.3(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-7USTS

Emission Unit Description:

This Emission Unit consists of the following seven (7) underground storage tanks. Six tanks are used to store solvents. The seventh tank is used for spill containment.

Tank #1 - 6,000 gallons Blend Alfa

Tank #2 - 6,000 gallons Blend 80/20

Tank(s) #3, #4, & #5 - 6,000 gallons total (3 2,000 gallons compartments)

Tank #3 - 2,000 gallons ALFA

Tank #4 - 2,000 gallons Blend Alfa

Tank #5 - 2,000 gallons Blend 80/20

Tank #6 - 6,000 gallons Blend 80/20

Tank #7 - 6,000 gallons spill containment

Building(s): UST Area

**Item 21.4(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1--EMRP

Emission Unit Description:

Emergency Fire Pump, considered an exempt source. As per 6 NYCRR 200.1 (cq), this engine cannot operate more than 500 hours. The 500 hours of annual operation for the engine include operation during emergency situations, routine maintenance, and routine exercising (for example, test firing the engine for one hour a week to ensure reliability).

Building(s): PLANT

**Item 21.5(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-PRINT

Emission Unit Description:

Up to four central-impression (CI) flexographic printing lines, up to two ink jet printing units, and up to two flexographic plate-making process. The flexographic printing lines have up to ten-color CI capability, downstream (in-line) coater/laminator capability, and

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back-side printing capability.

Volatile Organic Compound (VOC) emissions generated from solvent based operations are captured and controlled through the use of Permanent Total Enclosure technology (meeting criteria for 100% VOC capture efficiency) and the use of two (2) regenerative thermal oxidizers (RTOs). A catalytic oxidizer operates as a backup to be used if one of the RTO units is out of service.

The water based adhesive exhaust from emission source PRES 1, PRES 2, and PRES3 will be diverted from the plant's VOC emission control system. The make-up air for the water-based adhesive dryer for PRES 1, PRES 2, and PRES3 is provided from outside air and the exhaust from the water-based adhesive dryer is discharged through a separate stack to the atmosphere.

Building(s): PLANT

**Condition 22: Progress Reports Due Semiannually**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)**

**Item 22.1:**

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Condition 1-1: Operational Flexibility**  
**Effective between the dates of 08/12/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (f)**

**Item 1-1.1:**

A permit modification is not required for changes that are provided for in the permit. Such changes include approved alternate operating scenarios and changes that have been submitted and approved pursuant to an established operational flexibility protocol and the requirements of this section. Each such change cannot be a modification under any provision of Title I of the Clean Air Act or exceed, or cause the facility to exceed, an emissions cap or limitation in the permit. The facility owner or operator must incorporate all changes into any compliance certifications, record keeping, and/or reporting required by the permit.

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**Condition 23: Visible Emissions Limited**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 23.1:**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Condition 24: Emission offset requirements**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 231-2.4**

**Item 24.1:**

To satisfy the emission offset requirements of Part 231, the facility has obtained 78 (60 + 30%) VOC Emission Reduction Credits (ERCs) from the following sources:

Facility Name	DEC ID	ERCs (tpy)
Alcan Packaging	1-2820-00185	78

**Condition 25: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 234.3 (a)**

**Item 25.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
 CAS No: 0NY998-00-0 VOC

**Item 25.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall operate the oxidizers to ensure that oxidizer capacity is sufficient to achieve a minimum 98% destruction efficiency. The 98% destruction efficiency is required by both BACT and LAER. Press interlocks are installed in conjunction with oxidizer system programming controls that are designed to prevent oxidizer system operation at overcapacity (volumetric airflow) conditions. The electronic data recorder serving the oxidizer system continuously monitors fan speed (hertz) for each operating oxidizer and

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generates data demonstrating fan operation vs time. Programming controls are in place to prevent press operation in the case that sufficient oxidizer capacity is not on-line. Sufficient oxidizer capacity shall be based upon operating parameters determined during the most recent round of performance evaluation testing.

Monitoring Frequency: CONTINUOUS  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2021.  
Subsequent reports are due every 6 calendar month(s).

**Condition 26: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:40CFR 63.820(a)(7), Subpart KK**

**Item 26.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 26.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

A printing and publishing facility that has the potential to emit (PTE) HAP emissions above any of the Major Source thresholds may establish area source status by limiting its PTE through permit conditions. Emissions from the facility will be determined and recorded on a monthly basis. Compliance with the PTE limit must be maintained during every rolling 12 month period after the limit is established.

Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2022.  
Subsequent reports are due every 12 calendar month(s).

**Condition 27: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:40CFR 63.820(a)(7), Subpart KK**

**Item 27.1:**

The Compliance Certification activity will be performed for the Facility.

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Regulated Contaminant(s):  
 CAS No: 0NY100-00-0 TOTAL HAP

**Item 27.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
 DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility shall limit its total emissions to less than nine (9) tons for each individual HAP and to less than 22.5 tons for any combination of HAP's on a 12 rolling total basis.

The owner or operator of each facility which commits to the criteria of 40 CFR 63.820(a)(2) for the purpose of establishing an area source of HAP's shall maintain records of all required measurements and calculations needed to demonstrate compliance with area source status.

These records shall be kept on a monthly basis and shall include the mass of all HAP-containing materials used during the month, and the mass fraction of HAP present in each HAP-containing material used.

Calculations:

There are no HAP's expected to be emitted by the printing operations; however if HAP's are present in the solvents used in the printing operations, HAP emissions will be calculated as follows:

Monthly Calculations:

$$\text{HAP}(i) = (\text{TS} \times \text{F}(\text{HAP}(i)) \times \text{CEP} \times (1 - \text{DE}/100))/2000$$

where:

HAP(i) = Monthly HAP emissions from printing operations of an individual HAP (tons).

TS = Total amount of solvents used during the month (pounds).

CEP = VOC capture efficiency from print lines (percent).

F(HAP(i)) = Maximum fraction of solvents used that is comprised of the individual HAP species.

DE = VOC destruction efficiency in the oxidizers (percent).

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Facility Total Emission Rate of all HAP's

$$HAP(t) = S(HAP(i)) + HAP(c)$$

where:

HAP(t) = Facility total monthly emission rate of all HAP's.

S(HAP(i)) = Monthly sum of all individual HAP emissions from printing operations (tons).

HAP(i) = Monthly HAP emissions from printing operations of an individual HAP (tons).

HAP(c) = Monthly total emission rate of all HAP's from combustion sources (0.053 tons).

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 45000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2021.

Subsequent reports are due every 6 calendar month(s).

**Condition 28: Compliance Certification**

**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:40CFR 63.830(b)(1), Subpart KK**

**Item 28.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 28.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to this subpart shall submit the reports specified below to the Administrator:

(1) An initial notification required in Sec. 63.9(b).

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

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

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(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 Sec. 63.9(b), provided the same information is contained in the permit application as required by Sec. 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 notifications.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 29: Applicability**

**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:40CFR 63, Subpart ZZZZ**

**Item 29.1:**

Facilities that have reciprocating internal combustion engines must comply with applicable portions of 40 CFR 63 subpart ZZZZ.

**Condition 30: Compliance Certification**

**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:40CFR 63.6603(a), Subpart ZZZZ**

**Item 30.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: 1--EMRP

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an existing emergency and black start compression ignition stationary RICE located at an area source of HAP emissions must comply with the following maintenance procedures:

- (1) Change oil and filter every 500 hours of operation or annually, whichever comes first;
- (2) Inspect air cleaner every 1,000 hours of operation or

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annually, whichever comes first, and replace as necessary;  
 (3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Initial compliance will be demonstrated according to the provisions in 40 CFR 63.6630.

Continuous compliance will then be demonstrated according to 40 CFR 63.6640. The facility must keep records according to the provisions in 40 CFR 63.6655 and submit the notifications and reports listed in 40 CFR 63.6645 and 63.6650.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**\*\*\*\* Emission Unit Level \*\*\*\***

**Condition 31: Emission Point Definition By Emission Unit  
 Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 31.1(From Mod 2):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-CRNA1

Emission Point: 00008  
 Height (ft.): 45 Diameter (in.): 4  
 NYTMN (km.): 4515.63 NYTME (km.): 644.053 Building: PLANT

**Item 31.2(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-7USTS

Emission Point: 000T1  
 Height (ft.): 8 Diameter (in.): 2  
 NYTMN (km.): 4515.757 NYTME (km.): 644.012 Building: UST Area

Emission Point: 000T2  
 Height (ft.): 8 Diameter (in.): 2  
 NYTMN (km.): 4515.755 NYTME (km.): 644.012 Building: UST Area

Emission Point: 000T3  
 Height (ft.): 8 Diameter (in.): 2



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NYTMN (km.): 4515.763    NYTME (km.): 644.012    Building: UST Area

Emission Point: 000T4  
 Height (ft.): 8 Diameter (in.): 2  
 NYTMN (km.): 4515.757    NYTME (km.): 644.012    Building: UST Area

Emission Point: 000T5  
 Height (ft.): 8 Diameter (in.): 2  
 NYTMN (km.): 4515.76    NYTME (km.): 644.012    Building: UST Area

Emission Point: 000T6  
 Height (ft.): 8 Diameter (in.): 2  
 NYTMN (km.): 4515.76    NYTME (km.): 644.012    Building: UST Area

Emission Point: 000T7  
 Height (ft.): 8 Diameter (in.): 2  
 NYTMN (km.): 4515.76    NYTME (km.): 644.012    Building: UST Area

**Item 31.3(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-PRINT

Emission Point: 00001  
 Height (ft.): 52                      Diameter (in.): 52  
 NYTMN (km.): 4515.707    NYTME (km.): 643.961    Building: PLANT

Emission Point: 00002  
 Height (ft.): 52                      Length (in.): 42                      Width (in.): 76  
 NYTMN (km.): 4515.728    NYTME (km.): 643.961    Building: PLANT

Emission Point: 00003  
 Height (ft.): 44                      Diameter (in.): 3  
 NYTMN (km.): 4515.689    NYTME (km.): 644.014    Building: PLANT

Emission Point: 00004  
 Height (ft.): 45                      Diameter (in.): 12  
 NYTMN (km.): 4515.694    NYTME (km.): 644.017    Building: PLANT

Emission Point: 00005  
 Height (ft.): 12                      Diameter (in.): 24  
 NYTMN (km.): 4515.683    NYTME (km.): 644.017    Building: PLANT

Emission Point: 00006  
 Height (ft.): 68                      Diameter (in.): 62  
 NYTMN (km.): 4515.747    NYTME (km.): 643.961    Building: PLANT

**Condition 32: Process Definition By Emission Unit**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

**Item 32.1(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-CRNA1  
Process: CRN Source Classification Code: 3-16-050-03  
Process Description:  
Operation of Corona Treaters. Will exhaust outside the building without emission control.

Emission Source/Control: CRNA1 - Process  
Design Capacity: 500 feet per minute

Emission Source/Control: CRNA2 - Process  
Design Capacity: 500 feet per minute

**Item 32.2(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-SEAM1  
Process: SEA Source Classification Code: 4-02-007-01  
Process Description:  
Operation of seamer(s), which uses solvent adhesive to convert printed polymer film from a flat web into a sleeve shape.

Will exhaust inside building without emission control.

Emission Source/Control: SEAM1 - Process  
Design Capacity: 500 feet per minute

Emission Source/Control: SEAM2 - Process  
Design Capacity: 500 feet per minute

Emission Source/Control: SEAM3 - Process  
Design Capacity: 500 feet per minute

**Item 32.3(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-7USTS  
Process: TNK Source Classification Code: 4-05-007-01

Emission Source/Control: 0UST1 - Process  
Design Capacity: 6,000 gallons

Emission Source/Control: 0UST2 - Process  
Design Capacity: 6,000 gallons

Emission Source/Control: 0UST3 - Process  
Design Capacity: 2,000 gallons

Emission Source/Control: 0UST4 - Process

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

Design Capacity: 2,000 gallons

Emission Source/Control: 0UST5 - Process  
Design Capacity: 2,000 gallons

Emission Source/Control: 0UST6 - Process  
Design Capacity: 6,000 gallons

Emission Source/Control: 0UST7 - Process  
Design Capacity: 6,000 gallons

**Item 32.4(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1--EMRP  
Process: EMR Source Classification Code: 2-02-017-02  
Process Description: Emergency fire sprinkler system.

Emission Source/Control: ENG01 - Combustion  
Design Capacity: 210 horsepower (mechanical)

**Item 32.5(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-PRINT  
Process: 128 Source Classification Code: 4-05-003-01

Emission Source/Control: OXID1 - Control  
Control Type: CATALYTIC AFTERBURNER WITH HEAT  
EXCHANGER

Emission Source/Control: OXID2 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: OXID3 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: CLEAN - Process  
Design Capacity: 185 gallons

Emission Source/Control: PRES2 - Process  
Design Capacity: 10 Color Units

Emission Source/Control: PRES3 - Process  
Design Capacity: 10 Color Units

Emission Source/Control: PRESS - Process  
Design Capacity: 10 Color Units

**Item 32.6(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

Emission Unit: 1-PRINT  
 Process: 129 Source Classification Code: 4-05-005-97  
 Process Description:

Flexographic plate-making process employing low-emitting organic wash/cleaning materials. VOC emissions from this process will be captured and sent to the oxidizers for control. This process covers flexographic plate making operations.

Emission Source/Control: OXID1 - Control  
 Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: OXID2 - Control  
 Control Type: THERMAL OXIDATION

Emission Source/Control: OXID3 - Control  
 Control Type: THERMAL OXIDATION

Emission Source/Control: GRAPH - Process

**Item 32.7(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-PRINT  
 Process: 131 Source Classification Code: 4-01-002-96  
 Process Description:

Non-vapor phase parts washer that uses only organic solvents with an initial boiling point greater or equal to 300 degrees F at atmospheric pressure and a vapor pressure less than 1.00 mm Hg at 20 degrees C. The powered exhaust from the washer and fugitive VOC emissions from the parts washer room are ducted to the oxidizers for control. This process covers the parts washing operation.

Emission Source/Control: OXID1 - Control  
 Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: OXID2 - Control  
 Control Type: THERMAL OXIDATION

Emission Source/Control: OXID3 - Control  
 Control Type: THERMAL OXIDATION

Emission Source/Control: CLEAN - Process  
 Design Capacity: 185 gallons

**Item 32.8(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-PRINT

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

Process: AOS Source Classification Code: 4-05-002-01  
 Process Description:  
 Alternate Operating Scenario. Emission units have not yet been constructed.

Emission Source/Control: GRAP2 - Process

Emission Source/Control: INKJ2 - Process

Emission Source/Control: INKJT - Process

Emission Source/Control: PRES4 - Process

**Condition 33: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (v)**

**Item 33.1:**  
 The Compliance Certification activity will be performed for:

Emission Unit: 0-7USTS

**Item 33.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2021.

Subsequent reports are due every 6 calendar month(s).

**Condition 34: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 231-2.2**

**Item 34.1:**  
 The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

Regulated Contaminant(s):  
 CAS No: 0NY998-00-0    VOC

**Item 34.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
 DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility shall limit its VOC emissions to 60 tons per year on a 12 month rolling total basis.

The owner or operator shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria.

These records shall be kept on a monthly basis.

Calculation of Monthly Total VOC Emissions:

$$\text{VOC (t)} = \text{PRINT} + \text{GRAPH} + \text{CLEAN} + \text{COMB}$$

VOC(t) = Facility total monthly VOC emissions (tons).

PRINT = Monthly VOC emissions from printing operations (tons).

GRAPH = Monthly VOC emissions from graphic operations (tons).

CLEAN = Monthly VOC emissions from parts washer (tons).

COMB = Monthly VOC emissions from combustion sources (tons).

$$\text{PRINT} = (\text{TP} \times (\text{CEP}/100) \times (1 - \text{DE}/100))/2000$$

TP = Monthly VOC throughput from presses, inkjet printing units, and seaming/forming machines (lbs).

CEP = VOC capture efficiency from presses, inkjet printing units, and seaming/forming machines (%).

DE = VOC destruction efficiency (%).

$$\text{GRAPH} = \text{N} \times (\text{D} + \text{F}) \times (\text{CEG}/100) \times (1 - \text{DE}/100)/2000$$

N = number of square inches of plates made per month (square inches).

D = maximum dryer plate-making VOC emission factor (0.00010 lb/sq. inch).

F = maximum fugitive plate-making VOC emission factor (0.00006 lb/sq. inch).

CEG = VOC capture efficiency from graphic printing areas

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

(%).  
 DE = VOC destruction efficiency (%).

$$\text{CLEAN} = (\text{TC} \times (\text{CEC}/100) \times (1 - \text{DE}/100))/2000$$

TC = Monthly VOC throughput in parts cleaner (lbs).  
 CEC = VOC capture efficiency from parts cleaner (%).  
 DE = VOC destruction efficiency (%).

$$\text{COMB} = \text{NG} + \text{EG} + \text{FP}$$

NG = Monthly VOC emissions from all natural gas (NG) fired external combustion sources (tons).

EG = Monthly VOC emissions from all NG fired emergency generators (tons).

FP = Monthly VOC emissions from diesel fired fire pump IC engine (tons).

$$\text{NG} = (\text{NGEC} \times \text{EF}(\text{ng}))/2000$$

NGEC = Total monthly NG firing rate from all NG fired external combustion sources (million cubic feet).

EF(ng) = VOC emission factor (5.5 lb/million cubic feet)

$$\text{EG} = (\text{NGEG} \times \text{Hg} \times \text{EF}(\text{rice}))/2000$$

NGEG = Total monthly NG firing rate from the emergency generator (million cubic feet).

Hg = Heating value of NG (1000 BTU/cf).

EF(rice) = VOC emission factor (2.96E-2 lb/MMBTU)

$$\text{FP} = (\text{FPO} \times \text{EF}(\text{icd}) \times \text{HR}(\text{fp}))/2000$$

FPO = Rated output of diesel fired fire pump IC engine (210 HP)

EF(icd) = Total Hydrocarbon emission factor from manufacturer - Clarke model JU6H-UF50 (4.63E-04 lb/hp-hr).

HR(fp) = Number of hours fire pump engine is operated during the month (hr.).

Parameter Monitored: VOC

Upper Permit Limit: 60 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2021.

Subsequent reports are due every 6 calendar month(s).

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

**Condition 35: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 231-2.5**

**Item 35.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

LAER emission limit. Records for demonstration of compliance with the VOC emission limit shall be maintained on site for five years. Any exceedances of the allowable annual VOC emission limitation must be reported in writing to the DEC Regional office within 10 working days of the exceedance.

Parameter Monitored: VOC

Upper Permit Limit: 60 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 12 calendar month(s).

**Condition 36: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 234.3 (a)**

**Item 36.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL



Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility shall operate the oxidizers to ensure that oxidizer capacity is sufficient to achieve a minimum 98% destruction efficiency. The 98% destruction efficiency is required by both BACT and LAER.

This shall be accomplished through programming controls to disallow press operation if sufficient oxidizer capacity is not on-line.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 98 percent reduction by weight

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2021.

Subsequent reports are due every 6 calendar month(s).

**Condition 37: Compliance Certification**

**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR 234.3 (a)**

**Item 37.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

CAS No: 0NY100-00-0 TOTAL HAP

**Item 37.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Testing of each of the Catalytic and Thermal Oxidizers will be conducted at least once during the term of this permit in order to demonstrate a minimum VOC destruction efficiency of 98%. The 98% destruction efficiency is required by both BACT and LAER.

Within 60 days of the installation date of any new oxidizers, a test protocol shall be submitted to the Department for review. Within 120 days of the installation date, the testing will be completed.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 98 percent reduction by weight

Reference Test Method: 25A

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT  
 Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
 METHOD INDICATED  
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 38: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 38.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):  
 CAS No: 0NY998-00-0    VOC

**Item 38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
 DEVICE PARAMETERS AS SURROGATE

Monitoring Description:  
 [6 NYCRR Part 231-2, 40 CFR 64]

As part of the facility's Compliance Assurance Monitoring (CAM) Plan for the permanent total enclosure, the facility will monitor the pressure differential across the enclosure wall and the surrounding atmosphere when facility is in operation. Maintaining negative pressure in the enclosure allows the capture efficiency to be maintained.

An excursion is defined as any 5 minute block, when emission generating equipment is in operation, where the average pressure drop between the surrounding atmosphere and the enclosed area is less than 0.007 inches of water. This number is based upon Method 204 criteria.

Data will be collected at the enclosure wall and recorded electronically continuously. All electronic or manual data logs will be maintained for five years.

The facility will report any excursions and corrective actions on a semiannual basis; if not more frequently.

This condition becomes effective upon issuance of the permit. Until replaced, the facility can continue to operate using the ISO Tek model T-SPM2000-010.

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

Manufacturer Name/Model Number: Ashcroft model DX3F0142STP05IWL  
 Parameter Monitored: PRESSURE DROP  
 Lower Permit Limit: 0.007 inches of water  
 Monitoring Frequency: CONTINUOUS  
 Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 7/30/2021.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 39: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 39.1:**  
 The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

**Item 39.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:  
 As part of the Compliance Assurance Monitoring (CAM) Plan for the MEGTEC regenerative thermal oxidizers, the facility will monitor the combustion zone temperature.

Parameter Monitored: TEMPERATURE  
 Lower Permit Limit: 1550 degrees Fahrenheit  
 Monitoring Frequency: CONTINUOUS  
 Averaging Method: 3-HOUR BLOCK AVERAGE  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 7/30/2021.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 40: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 40.1:**  
 The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

**Item 40.2:**  
 Compliance Certification shall include the following monitoring:

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

As part of the Compliance Assurance Monitoring (CAM) Plan for the MEGTEC catalytic oxidizer, the facility will monitor the catalyst bed inlet temperature.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2021.

Subsequent reports are due every 6 calendar month(s).

**Condition 41: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement: 40 CFR Part 64**

**Item 41.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

CAS No: 0NY998-00-0 VOC

**Item 41.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

[6 NYCRR Part 231-2, 40 CFR 64]

As part of the facility's Compliance Assurance Monitoring (CAM) Plan for the three oxidizers, the facility will perform monthly external inspections and annual internal inspections for wear and structural integrity.

Maintaining the integrity of these systems ensures that the capture efficiency to is maintained.

An excursion is defined as any instance where the observation indicates that an oxidizer is structurally unsound.

A written or electronic log of every inspection will be maintained at the facility for at least five years.

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

Manufacturer Name/Model Number: Megtec and both Megtec Clean Switch Oxidizers  
 Monitoring Frequency: MONTHLY  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 7/30/2021.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 42: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement: 40 CFR Part 64**

**Item 42.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY100-00-0	TOTAL HAP
CAS No: 0NY998-00-0	VOC

**Item 42.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

[6 NYCRR Part 231-2, 40 CFR 64]

As part of the facility's Compliance Assurance Monitoring (CAM) Plan for the Megtec Catalytic Oxidizer, the facility will have the condition of the catalyst assessed annually.

The analysis will consist of evaluations of a sample of the catalyst. Conversion Efficiency (by FID or equivalent), Surface Area, and Contamination (Inductively Coupled Plasma (ICP)) results will be compared against existing manufacturer knowledge base.

An excursion is defined as any instance where the analysis results in a recommendation that corrective action be taken.

A written or electronic record of every analysis and corrective action taken will be maintained at the facility for at least five years.

Manufacturer Name/Model Number: Megtec Magnum - Catalyst  
 Reference Test Method: Conversion Efficiency, Surface Area & ICP  
 Monitoring Frequency: ANNUALLY  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

The initial report is due 7/30/2021.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 43: Compliance Certification**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable Federal Requirement:40 CFR Part 64**

**Item 43.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY100-00-0	TOTAL HAP
CAS No: 0NY998-00-0	VOC

**Item 43.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

[6 NYCRR Part 231-2, 40 CFR 64]

As part of the facility's Compliance Assurance Monitoring (CAM) Plan for the permanent total enclosure, the facility will inspect the integrity of the exhaust system, from the process to the control device, and the integrity of the enclosure. Maintaining the integrity of these systems ensures that the capture efficiency is maintained.

An excursion is defined as any instance where the integrity of the enclosure or capture system is identified.

A written or electronic log of every inspection will be maintained at the facility for at least five years.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2021.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-2: Compliance Certification**  
**Effective between the dates of 08/12/2021 and 03/16/2026**

**Applicable Federal Requirement:6 NYCRR Subpart 228-2**

**Item 1-2.1:**

The Compliance Certification activity will be performed for:

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

Emission Unit: 1-SEAM1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-2.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

A lesser degree of control will be allowed for this process than is required under 6 NYCRR Part 228-2.4, subdivisions (a), (c) and (e). The total VOC emissions from all seaming operations at the facility must remain less than three tons per year (3 tpy) on a rolling twelve month basis. Emissions shall be calculated using a combination of material usage and production records of material processed by the equipment. Records of the data used demonstrating compliance with this condition shall be retained on site for five years and made available to the Department upon request.

The facility will re-evaluate every five years applicability with 6 NYCRR Part 228-2 or sooner prior to any facility process/material changes or Department revisions to Part 228-2. Any findings indicating that the 3 tpy VOC emission limit mentioned above is no longer warranted will require a permit modification. The first re-evaluation will be due to the Department no later than five years from the date of issue of this permit.

Parameter Monitored: VOC

Upper Permit Limit: 3 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

Subsequent reports are due every 6 calendar month(s).

Permit ID: 1-4728-04190/00004

Facility DEC ID: 1472804190

**STATE ONLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

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

An emergency, as defined in 6 NYCRR subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall demonstrate, 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 facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction provision contained in any applicable requirement.

**Item B: 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



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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.

#### STATE ONLY APPLICABLE REQUIREMENTS

**The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.**

**Condition 44: Contaminant List**

**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable State Requirement: ECL 19-0301**

**Item 44.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit (emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0  
Name: TOTAL HAP

CAS No: 0NY998-00-0  
Name: VOC

**Condition 45: Malfunctions and Start-up/Shutdown Activities**

**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable State Requirement: 6 NYCRR 201-1.4**

**Item 45.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance

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of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedence occurred and if it was unavoidable, include the time, frequency and duration of the exceedence, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedences to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 46: CLCPA Applicability**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable State Requirement:6 NYCRR 201-6.5 (a)**

**Item 46.1:**

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

**Condition 47: Air pollution prohibited**  
**Effective between the dates of 03/17/2021 and 03/16/2026**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 47.1:**

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

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property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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