



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 6-2336-00028/00051  
Effective Date: 12/01/2017 Expiration Date: 11/30/2022

Permit Issued To: NEENAH NORTHEAST, LLC  
3460 Preston Ridge Rd Ste 600  
Alpharetta, GA 30005

Facility: Neenah Northeast - Lowville  
5492 BOSTWICK ST  
LOWVILLE, NY 13367

Contact: JONATHAN ROSE  
NEENAH NORTHEAST LLC  
5492 BOSTWICK ST  
LOWVILLE, NY 13367  
(315) 376-4861

Description:

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: THOMAS G VOSS  
NYSDEC - REGION 6  
317 WASHINGTON ST  
WATERTOWN, NY 13601-3787

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



**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.



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

**Facility Level**

- Submission of application for permit modification or renewal-REGION 6 HEADQUARTERS



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

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 6 Headquarters  
Division of Environmental Permits  
State Office Building, 317 Washington Street  
Watertown, NY 13601-3787  
(315) 785-2245

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



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

**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: NEENAH NORTHEAST, LLC  
3460 Preston Ridge Rd Ste 600  
Alpharetta, GA 30005

Facility: Neenah Northeast - Lowville  
5492 BOSTWICK ST  
LOWVILLE, NY 13367

Authorized Activity By Standard Industrial Classification Code:  
2672 - PAPER COATED AND LAMINATED, NEC  
2621 - PAPER MILLS EXC BUILDING PAPER

Permit Effective Date: 12/01/2017

Permit Expiration Date: 11/30/2022



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (a) (7): Fees
- 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 23 6 NYCRR 211.1: Air pollution prohibited
- 24 6 NYCRR 212-1.6 (a): Compliance Certification
- 25 6 NYCRR 212-2.4 (b): Compliance Certification
- 26 6 NYCRR 228-1.1 (a) (3): Once in always in
- 27 6 NYCRR 228-1.1 (b) (9): Compliance Certification
- 28 6 NYCRR 228-1.3 (a): Compliance Certification
- 29 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 30 6 NYCRR 228-1.6 (a): Compliance Certification
- 31 6 NYCRR 228-1.6 (c): Surface coating access for sampling
- 32 6 NYCRR 228-1.6 (h): Compliance Certification
- 33 6 NYCRR 228-1.10: Compliance Certification
- 34 6 NYCRR 228-1.10: Compliance Certification
- 35 6 NYCRR 234.3 (f): Compliance Certification
- 36 6 NYCRR 234.6: Compliance Certification
- 37 6 NYCRR 234.7: Compliance Certification
- 38 6 NYCRR 234.8: Compliance Certification
- 39 40CFR 63.820(b), Subpart KK: Exemption for research and laboratory equipment
- 40 40CFR 63.821(a)(2), Subpart KK: Sources affected by Subpart KK
- 41 40CFR 63.821(a)(3), Subpart KK: Inclusion of stand-alone coating equipment as part of an affected source.



- 42 40CFR 63.821(c), Subpart KK: Once in, always in.
- 43 40CFR 63.825(b), Subpart KK: Compliance Certification
- 44 40CFR 63.826(b), Subpart KK: Compliance date for a new affected source
- 45 40CFR 63.827(b)(2), Subpart KK: Compliance Certification
- 46 40CFR 63.827(c)(3), Subpart KK: Compliance Certification
- 47 40CFR 63.829(a), Subpart KK: Subpart A record keeping provisions.
- 48 40CFR 63.829(b)(1), Subpart KK: Compliance Certification
- 49 40CFR 63.830(a), Subpart KK: Subpart A reporting requirements.
- 50 40CFR 63.830(b)(1), Subpart KK: Compliance Certification
- 51 40CFR 63.830(b)(3), Subpart KK: Compliance Certification
- 52 40CFR 63.830(b)(6), Subpart KK: Compliance Certification
- 53 40CFR 63.7495(b), Subpart DDDDD: Compliance Certification
- 54 40CFR 63.7495(d), Subpart DDDDD: Notification requirements
- 55 40CFR 63.7530(f), Subpart DDDDD: Notification of compliance status
- 56 40CFR 63.3300, Subpart JJJJ: Definition of Affected Source.
- 57 40CFR 63.3320(b)(2), Subpart JJJJ: Compliance Certification
- 58 40CFR 63.3320(b)(3), Subpart JJJJ: Compliance Certification
- 59 40CFR 63.3330(a), Subpart JJJJ: Compliance date for existing affected sources.
- 60 40CFR 63.3330(b), Subpart JJJJ: Compliance date for new affected sources.
- 61 40CFR 63.3360(c), Subpart JJJJ: Compliance Certification
- 62 40CFR 63.3360(d), Subpart JJJJ: Compliance Certification
- 63 40CFR 63.3370(b), Subpart JJJJ: Compliance Certification
- 64 40CFR 63.3370(c), Subpart JJJJ: Compliance Certification
- 65 40CFR 63.3370(c)(5), Subpart JJJJ: Compliance Certification
- 66 40CFR 63.3400(b), Subpart JJJJ: Compliance Certification
- 67 40CFR 63.3400(c)(1), Subpart JJJJ: Compliance Certification
- 68 40CFR 63.3400(c)(2), Subpart JJJJ: Compliance Certification
- 69 40CFR 63.3400(e), Subpart JJJJ: Compliance Certification
- 70 40CFR 63.3410(a), Subpart JJJJ: Compliance Certification

**Emission Unit Level**

- 71 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 72 6 NYCRR Subpart 201-6: Process Definition By Emission Unit
- 73 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

**EU=0-00001**

- 74 6 NYCRR 227-1.3 (a): Compliance Certification
- 75 6 NYCRR 227-1.6: Corrective Action
- 76 40CFR 63.7500(a)(1), Subpart DDDDD: Compliance Certification
- 77 40CFR 63.7500(a)(3), Subpart DDDDD: Good air pollution control practices
- 78 40CFR 63.7530(d), Subpart DDDDD: Compliance Certification
- 79 40CFR 63.7530(e), Subpart DDDDD: Compliance Certification
- 80 40CFR 63.7550(c), Subpart DDDDD: Compliance Certification
- 81 40CFR 63.7550(d), Subpart DDDDD: Compliance Certification
- 82 40CFR 63.7555(a), Subpart DDDDD: Compliance Certification
- 83 40CFR 63.7560, Subpart DDDDD: Compliance Certification
- 84 6 NYCRR 234.3 (a) (1) (i): Compliance Certification
- 85 6 NYCRR 234.3 (e) (1) (i) ('a'): Compliance Certification
- 86 6 NYCRR 234.4 (b): Compliance Certification

**EU=0-00002,Proc=024**





87 40CFR 63.823, Subpart KK: Part 63 General Provisions requirements

**EU=0-00003,Proc=031**

- 88 40CFR 63.8000(a), Subpart HHHHH: Overall requirements for subpart HHHHH
- 89 40CFR 63.8000(b), Subpart HHHHH: Opening of safety devices
- 90 40CFR 63.8005(a), Subpart HHHHH: Compliance Certification
- 91 40CFR 63.8055, Subpart HHHHH: Compliance Certification
- 92 40CFR 63.8095, Subpart HHHHH: General provisions applicability

**EU=0-00005**

\*93 6 NYCRR Subpart 201-7: Capping Monitoring Condition

**EU=0-00005,Proc=030**

94 6 NYCRR 228-1.4 (d) (3): Compliance Certification

**EU=0-00005,Proc=034**

95 40CFR 63.823, Subpart KK: Part 63 General Provisions requirements

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 96 ECL 19-0301: Contaminant List
- 97 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 98 6 NYCRR 211.2: Visible Emissions Limited
- 99 6 NYCRR 212-2.3 (b): Compliance Demonstration
- 100 6 NYCRR 217-3.3: Exceptions

NOTE: \* preceding the condition number indicates capping.



**FEDERALLY ENFORCEABLE CONDITIONS**

**\*\*\*\* 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



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



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



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 12/01/2017 and 11/30/2022**

**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

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



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 12/01/2017 and 11/30/2022**

**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 12/01/2017 and 11/30/2022**

**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 12/01/2017 and 11/30/2022**

**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



reports required by the permit.

**Condition 5: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**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,



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





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 1/30/2018.

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

**Condition 6: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**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



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 – Stationary Source Compliance Section  
USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
State Office Building  
317 Washington Street  
Watertown, NY 13601-3787

The address for the BQA is as follows:

NYSDEC

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



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 1/30/2018.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**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.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due by April 15th for previous calendar year

**Condition 8: Recordkeeping requirements**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**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.

**Condition 9: Open Fires - Prohibitions**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**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.

**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 12/01/2017 and 11/30/2022**

**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 12/01/2017 and 11/30/2022**

**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 12/01/2017 and 11/30/2022**

**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 12/01/2017 and 11/30/2022**

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

**Item 13.1:**

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 12/01/2017 and 11/30/2022**



**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 12/01/2017 and 11/30/2022**

**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 12/01/2017 and 11/30/2022**

**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; 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 12/01/2017 and 11/30/2022**



**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 12/01/2017 and 11/30/2022**

**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 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40 CFR Part 68**

**Item 19.1:**

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:

**New York State Department of Environmental Conservation**

**Permit ID: 6-2336-00028/00051**

**Facility DEC ID: 6233600028**



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 12/01/2017 and 11/30/2022**

**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 12/01/2017 and 11/30/2022**

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

**Item 21.1:**

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

Emission Unit: 0-00001

Emission Unit Description:

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

Building(s): MAIN

**Item 21.2:**

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

Emission Unit: 0-00002

Emission Unit Description:

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

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





and Dryers.

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

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

Building(s): MAIN

**Item 21.3:**

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

Emission Unit: 0-00003

Emission Unit Description:

Waterbased coating make-up room Schold's Mixer. Emission point 00016. Water-based coating make-up room. Emission point 00031 associated with room.

Building(s): MAIN

**Item 21.4:**

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

Emission Unit: 0-00005

Emission Unit Description:

This emission unit includes Printer/Coater 3AQ, previously Coater #5, (emission point 00050), Aqueous Coater 10AQ, previously Tandem Coater, (emission points 00048 & 00049), Printer #1 (emission point 00052), Printer #2, mixing and dispensing operations, (emission points 00054 & 00055) and wastewater treatment operations (emission points 00056 & 00057).

Building(s): MAIN

**Condition 22: Progress Reports Due Semiannually  
Effective between the dates of 12/01/2017 and 11/30/2022**

**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.

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



**Condition 23: Air pollution prohibited**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 23.1:**

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 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.

**Condition 24: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 212-1.6 (a)**

**Item 24.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 24.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 25: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 212-2.4 (b)**

**Item 25.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Emission Unit: 0-00002

Emission Unit: 0-00003

Emission Unit: 0-00005

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

CAS No: 0NY075-00-0 PARTICULATES

**Item 25.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part. Testing will be completed to show compliance upon request from the Department.

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5/201A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 26: Once in always in  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement: 6 NYCRR 228-1.1 (a) (3)**

**Item 26.1:**

Any coating line that is or becomes subject to the provisions of Subpart 228-1 will remain subject to these provisions even if the annual potential to emit or actual emissions of VOCs for the facility later falls below the thresholds set forth in Subdivision 228-1.1(a).

**Condition 27: Compliance Certification**



Effective between the dates of 12/01/2017 and 11/30/2022

Applicable Federal Requirement:6 NYCRR 228-1.1 (b) (9)

**Item 27.1:**

The Compliance Certification activity will be performed for the Facility.

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

**Item 27.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A facility performing surface coating operations may use up to 55 gallons of coating or have up to 400 lbs of VOC emissions on a 12-month rolling total that is not subject to the requirements of Subpart 228-1. This exemption is contingent on the owner or operator of the facility maintaining records of such surface coatings, and maintaining compliance with all requirements of section 228-1.3

Parameter Monitored: VOLUME  
Upper Permit Limit: 55 gallons  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2018.  
Subsequent reports are due every 6 calendar month(s).

**Condition 28: Compliance Certification**  
Effective between the dates of 12/01/2017 and 11/30/2022

Applicable Federal Requirement:6 NYCRR 228-1.3 (a)

**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: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of



uncombined water. Compliance will be determined by conducting a Method 9 opacity evaluation at the request of the Department, while the source is in normal operating mode.

In addition to the above opacity evaluation, the permittee will conduct monthly observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Inclement weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry.

If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

**\*\* NOTE \*\*** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and



stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: MONTHLY

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 29: Surface Coating- Prohibitions**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 228-1.3 (c)**

**Item 29.1:**

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

**Condition 30: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 228-1.6 (a)**

**Item 30.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 30.2:**

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 0.08 pounds of VOC per pound of coating

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 31: Surface coating access for sampling**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 228-1.6 (c)**

**Item 31.1:**

Representatives of the department must be permitted on the facility owner's property, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with the requirements of 6 NYCRR Part 228-1.

**Condition 32: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 228-1.6 (h)**

**Item 32.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 32.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



**Monitoring Description:**

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 33: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement: 6 NYCRR 228-1.10**

**Item 33.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 33.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of this facility subject to 6NYCRR Part 228 must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;



**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents.

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

All associated coating line work area(s) within the facility shall be inspected daily to determine if there are any open containers present, and that only acceptable spray gun cleaning methods were utilized. A log book shall be maintained to record these inspections and their results. The log book shall include the following information:

- date and time of inspection
- items or areas observed
- corrective measures taken, if necessary

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 34: Compliance Certification**

**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement: 6 NYCRR 228-1.10**

**Item 34.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002

Emission Unit: 0-00003

Emission Unit: 0-00005

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 34.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of this facility subject to 6NYCRR Part 228 must:



(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents.

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

All associated coating line work area(s) within the facility shall be inspected daily to determine if there are any open containers present, and that only acceptable spray gun cleaning methods were utilized. A log book shall be maintained to record these inspections and their results. The log book shall include the following information:

- date and time of inspection
- items or areas observed
- corrective measures taken, if necessary

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 35: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**



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

**Item 35.1:**

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

Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

The Department may allow printing processes to operate with a lesser degree of control than is required by this section provided that a process specific reasonably available control technology (RACT) demonstration has been made to the satisfaction of the Department. Such process specific RACT demonstrations will be submitted by the Department to the United States Environmental Protection Agency as a revision to the State Implementation Plan and must address the technical and economic feasibility of using:

- (1) low VOC content ink, coating or adhesive;
- (2) demonstrated and proven emission control technologies that will achieve the required overall removal efficiency as required by this section;
- (3) demonstrated and proven emission control technologies that will achieve a degree of overall removal efficiency less than required by this section; and
- (4) demonstrated and proven production modifications methods that will result in real, documented, and enforceable reductions in the VOC emissions from the printing process.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 36: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 234.6**



**Item 36.1:**

The Compliance Certification activity will be performed for the Facility.

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

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility subject to this Part shall not:

(a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 37: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 234.7**

**Item 37.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

Regulated Contaminant(s):

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



CAS No: 0NY998-00-0 VOC

**Item 37.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, use, and production records of ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material must be maintained in a format acceptable to the Department, and upon request, submitted to the Department. Any other information required to determine compliance with this Part must be provided to the Department in an acceptable format. Records must be maintained at the facility for five years.

The results of an analysis or other procedure used to establish compliance with this Part must be provided to the Department. Department representatives shall be permitted, during reasonable business hours, to obtain ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

The owner or operator of a graphic art facility which is not subject to the control requirements of this Part because its annual potential to emit VOC or its total actual VOC emissions, whichever applies is below the applicability criteria, must maintain records in a format acceptable to the Department that verify the facility's annual potential to emit VOC or its total actual VOC emissions. Upon request, these records must be submitted to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 38: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 234.8**

**Item 38.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Process: 024

Emission Unit: 0-00005

Process: 034

**Item 38.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The average opacity of emissions associated with this process is limited to less than 10% for any 6-minute average. The facility will demonstrate compliance by conducting visible emissions observations semi-annually and will immediately investigate any instance where there is cause to believe that visible emissions are above those that are normal and in compliance with this limit.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Reference Test Method: EPA RM 9

Monitoring Frequency: SEMI-ANNUALLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 39: Exemption for research and laboratory equipment  
Effective between the dates of 12/01/2017 and 11/30/2022**

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

**Item 39.1:**

The provisions of 40 CFR Part 63 Subpart KK do not apply to research or laboratory equipment.

**Condition 40: Sources affected by Subpart KK  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.821(a)(2), Subpart KK**

**Item 40.1:**

The affected sources subject to 40CFR63 Subpart KK include all of the product and packaging rotogravure or wide-web flexographic printing presses at a facility plus any other equipment at that facility which the owner or operator chooses to include in accordance with paragraph (a)(3) of section 63.821, except

(i) Proof presses, and

(ii) Any product and packaging rotogravure or wide-web flexographic press which is used

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



primarily for coating, laminating, or other operations which the owner or operator chooses to exclude, provided that

(A) The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print stations in each month never exceeds five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations, and

(B) The owner or operator maintains records as required in §63.829(f).

**Condition 41: Inclusion of stand-alone coating equipment as part of an affected source.**

**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.821(a)(3), Subpart KK**

**Item 41.1:**

The owner or operator of an affected source, as defined in paragraph (a)(2) of this section, may elect to include in that affected source stand-alone coating equipment subject to the following provisions:

(i) Stand-alone coating equipment meeting any of the criteria specified in this subparagraph is eligible for inclusion:

(A) The stand-alone coating equipment and one or more product and packaging rotogravure or wide-web flexographic presses are used to apply solids-containing materials to the same web or substrate, or

(B) The stand-alone coating equipment and one or more product and packaging rotogravure or wide-web flexographic presses apply a common solids-containing material, or

(C) A common control device is used to control organic HAP emissions from the stand-alone coating equipment and from one or more product and packaging rotogravure or wide-web flexographic printing presses;

(ii) All eligible stand-alone coating equipment located at the facility is included in the affected source; and

(iii) No product and packaging rotogravure or wide-web flexographic presses are excluded from the affected source under the provisions of paragraph (a)(2)(ii) of this section.

**Condition 42: Once in, always in.**

**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.821(c), Subpart KK**

**Item 42.1:**

Each product and packaging rotogravure or wide-web flexographic printing affected source at a facility that is a major source of HAP, as defined in 40 CFR 63.2, that complies with neither the criterion of paragraph (b)(1) nor (b)(2) of section 63.821 in any month after the applicable compliance date as specified in section 63.826 is, starting with that month, subject to all relevant

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



requirements of Subpart KK and is no longer eligible to use the provisions of paragraph (b) of section 63.821, even if in subsequent months the affected source does comply with the criteria of paragraphs (b)(1) or (b)(2) of section 63.821.

**Condition 43: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.825(b), Subpart KK**

**Item 43.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

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

**Item 43.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit emissions to no more than five percent of the organic HAP applied for the month; or to no more than four percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. The owner or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures in paragraphs (1) through (5) below:

(1) Demonstrate that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.04 weight-fraction organic HAP, on an as-purchased basis, as determined in accordance with Sec. 63.827(b)(2).





(2) Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with paragraphs (b)(2)(i)-(ii) of this section. The owner or operator shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application, as follows:

(i) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with Sec. 63.827(b)(2).

(ii) Calculate the monthly average as-applied organic HAP content, (C<sub>ahi</sub>), of each ink, coating, varnish, adhesive, primer, and other solids-containing material using Equation 3 of this section.

(3)(i) Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied, either

(A) Contains no more than 0.04 weight-fraction organic HAP on a monthly average as-applied basis, or

(B) Contains no more than 0.20 kg of organic HAP per kg of solids applied, on a monthly average as-applied basis.

(ii) The owner or operator may demonstrate compliance in accordance with paragraphs (b)(3)(ii) (A)-(C) of this section.

(A) Use the procedures of paragraph (b)(2) of this section to determine which materials meet the requirements of paragraph (b)(3)(i)(A) of this section,

(B) Determine the as-applied solids content following the procedure in Sec. 63.827(c)(2) of all materials which do not meet the requirements of paragraph (b)(3)(i)(A) of this section. The owner or operator may calculate the monthly average as-applied solids content of materials which are reduced, thinned, or diluted prior to application, using Equation 4 of this section, and

(C) Calculate the as-applied organic HAP to solids ratio, (H<sub>si</sub>), for all materials which do not meet the requirements of paragraph (b)(3)(i)(A) of this section, using Equation 5 of this section.

(4) Demonstrate that the monthly average as-applied organic HAP content, (H<sub>L</sub>), of all materials applied is less than 0.04 kg HAP per kg of material applied, as determined by Equation 6 of this section.

(5) Demonstrate that the monthly average as-applied organic HAP content on the basis of solids applied, (H<sub>S</sub>),

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



is less than 0.20 kg HAP per kg solids applied as determined by Equation 7 of this section.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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 1/30/2018.

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

**Condition 44: Compliance date for a new affected source  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.826(b), Subpart KK**

**Item 44.1:**

The compliance date for a facility with a new affected source subject to the provisions of 40CFR63, Subpart KK is immediately upon startup of the affected source, or May 30, 1996, whichever is later.

**Condition 45: Compliance Certification  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.827(b)(2), Subpart KK**

**Item 45.1:**

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

Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

**Item 45.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Each facility with a product and packaging rotogravure or wide-web flexographic printing facility shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following one of the following procedures:

1) Testing the material in accordance with Method 311 of appendix A of 40CFR63. The Method 311 determination may



be performed by the manufacturer of the material and the results provided to the facility. If these values cannot be determined using Method 311, the facility shall submit an alternative technique for determining their values for approval by EPA. The recovery efficiency of the technique must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.

2) The facility may determine the volatile matter content of the material in accordance with §63.827(c)(2) and use this value for the organic HAP content for all compliance purposes.

3) The facility may rely on formulation data provided by the manufacturer of the material on a Certified Product Data Sheet (CPDS) if the manufacturer has included in the organic HAP content determination all HAP present at a level greater than 0.1% in any raw material used, weighted by the mass fraction of each raw material used in the material, and the manufacturer has determined the HAP content of each raw material present in the formulation by Method 311 of 40CFR63, Appendix A, or by an alternative method approved by EPA, or by reliance on a CPDS from a raw material supplier prepared in accordance with this condition.

In the event that the Method 311 test value is higher than the formulation data, the Method 311 test data shall govern, unless after consultation, a facility demonstrates to the satisfaction of NYSDEC that the formulation data are correct.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: 0.04 percent by weight

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 46: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.827(c)(3), Subpart KK**

**Item 46.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

**Item 46.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators may determine the volatile matter content of materials based on formulation data, and may rely on volatile material content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40CFR60, Appendix A, the applicable test method shall govern, unless after consultation, the owner or operator can demonstrate to the satisfaction of the Department that the formulation data are correct.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 47: Subpart A record keeping provisions.  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.829(a), Subpart KK**

**Item 47.1:**

The record keeping provisions of 40CFR Part 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40CFR63 Subpart KK are listed in Table 1 of 40CFR63 Subpart KK.

**Condition 48: Compliance Certification  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.829(b)(1), Subpart KK**

**Item 48.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Regulated Contaminant(s):  
CAS No: ONY100-00-0 TOTAL HAP

**Item 48.2:**

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 40CFR Part 63 Subpart KK shall maintain the following records on a monthly basis in accordance with the requirements of 40CFR63.10(b)(1):

Records specified in 40CFR63.10(b)(2), of all measurements needed to demonstrate compliance with Subpart KK, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 49: Subpart A reporting requirements.**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

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

**Item 49.1:**

The reporting provisions of 40CFR Part 63 Subpart A that apply and those that do not apply to owners and operators of affected sources subject to 40CFR Part 63 Subpart KK are listed in Table 1 of Subpart KK.

**Condition 50: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

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

**Item 50.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



**Item 50.2:**

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).

(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: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 51: Compliance Certification**

**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.830(b)(3), Subpart KK**

**Item 51.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



**Item 51.2:**

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 40CFR63 Subpart KK shall submit a Notification of Compliance Status, as specified in 40CFR63.9(h), to the Administrator.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 52: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.830(b)(6), Subpart KK**

**Item 52.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

**Item 52.2:**

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 40CFR63 Subpart KK shall submit a Summary Report, as specified in 40CFR63.10(e)(3), on a semi-annual basis.

In addition to a report of operating parameter exceedances as required by Section 63.10(e)(3)(i), the summary report shall include any exceedances of the standards in Sections 63.824-63.825.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



**Condition 53: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.7495(b), Subpart DDDDD**

**Item 53.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 53.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities that are major sources of hazardous air pollutants (HAPs) that have industrial, commercial or institutional boilers must comply with 40 CFR 63 Subpart DDDDD by January 31, 2016.

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 54: Notification requirements**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.7495(d), Subpart DDDDD**

**Item 54.1:**

The owner or operator of an affected boiler must meet the notification requirements in 40 CFR 63.7545 according to the schedule in 40 CFR 63.7545 and in 40 CFR 63 subpart A. Some of the notifications must be submitted before the owner or operator is required to comply with the emission limits and work practice standards in subpart DDDDD.

**Condition 55: Notification of compliance status**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.7530(f), Subpart DDDDD**

**Item 55.1:**

The owner or operator of an affected boiler must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 CFR 63.7545(e).

**Condition 56: Definition of Affected Source.**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3300, Subpart JJJJ**

**Item 56.1:**

The affected source subject to this subpart is the collection of all web coating lines at your facility. This includes web coating lines engaged in the coating of metal webs that are used in flexible packaging, and web coating lines engaged in the coating of fabric substrates for use in



**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



pressure sensitive tape and abrasive materials. Web coating lines specified in paragraphs (a) through (g) of this section are not part of the affected source of this subpart.

(a) Any web coating line that is stand-alone coating equipment under subpart KK of this part (national emission standards for the printing and publishing industry) which the owner or operator includes in the affected source under subpart KK.

(b) Any web coating line that is a product and packaging rotogravure or wide-web flexographic press under subpart KK of this part (national emission standards for the printing and publishing industry) which is included in the affected source under subpart KK.

(c) Web coating in lithography, screenprinting, letterpress, and narrow-web flexographic printing processes.

(d) Any web coating line subject to subpart EE of this part (national emission standards for magnetic tape manufacturing operations).

(e) Any web coating line that will be subject to the national emission standards for hazardous air pollutants (NESHAP) for surface coating of metal coil currently under development.

(f) Any web coating line that will be subject to the NESHAP for the printing, coating, and dyeing of fabric and other textiles currently under development. This would include any web coating line that coats both a paper or other web substrate and a fabric or other textile substrate, except for a fabric substrate used for pressure sensitive tape and abrasive materials.

(g) Any web coating line that is defined as research or laboratory equipment in Sec. 63.3310.

**Condition 57: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement: 40CFR 63.3320(b)(2), Subpart JJJJ**

**Item 57.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002  
Process: 021

Emission Unit: 0-00002  
Process: 022

Emission Unit: 0-00002  
Process: 026

Emission Unit: 0-00005  
Process: 030

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

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



**Item 57.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility must limit the organic HAP emissions to no more than 4% of the mass of coating materials applied for each month on and after December 5, 2005. Compliance shall be demonstrated using the provisions listed in §63.3370.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: 4 percent by weight

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 58: Compliance Certification**

**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3320(b)(3), Subpart JJJJ**

**Item 58.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002

Process: 021

Emission Unit: 0-00002

Process: 022

Emission Unit: 0-00002

Process: 026

Emission Unit: 0-00005

Process: 030

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 58.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



OPERATIONS

Monitoring Description:

The facility must limit the organic HAP emissions to no more than 20% of the mass of coating solids applied for each month on and after the compliance date of December 5, 2005. Compliance shall be demonstrated using the provisions listed in §63.3370.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: 20 percent by weight

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 59: Compliance date for existing affected sources.  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3330(a), Subpart JJJJ**

**Item 59.1:**

An existing affected source subject to the provisions of this subpart, must comply by December 5, 2005. Facility must complete any performance test required in § 63.3360 within the time limits specified in § 63.7(a)(2).

**Condition 60: Compliance date for new affected sources.  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3330(b), Subpart JJJJ**

**Item 60.1:**

If the facility owns or operates a new affected source (defined as having commenced construction or reconstruction after September 13, 2000), the compliance date for the affected source is immediately upon startup or by December 4, 2002, whichever is later. Any performance tests required in §63.3360 must be completed within the time limits set forth in §63.7(a)(2).

**Condition 61: Compliance Certification  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3360(c), Subpart JJJJ**

**Item 61.1:**

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

Emission Unit: 0-00002

Process: 021



Emission Unit: 0-00002  
Process: 022

Emission Unit: 0-00002  
Process: 026

Emission Unit: 0-00005  
Process: 030

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

**Item 61.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility determines compliance with the emission limits in §63.3320 by means other than determining control efficiency of a control device, the facility must determine the organic HAP mass fraction of each coating material "as-purchased" by one of the following procedures:

- 1) The facility may test the coating material in accordance with Method 311 of appendix A of 40CFR63. This determination may be done by the manufacturer of the coating material and the results provided to the owner/operator. The organic HAP content must be calculated according to the procedures and criteria in §63.3360(c)(1)(i)-(iii).
- 2) For coatings, the facility may determine the volatile organic content as mass fraction of nonaqueous volatile matter and use it as a substitute for organic HAP using Method 24 of 40CFR60, appendix A. This determination may be performed by the manufacturer of the coating and the results provided to the affected source.
- 3) The facility may use formulation data to determine the organic HAP mass fraction of a coating material. Formulation data may be provided to the owner/operator by the manufacturer of the material.
- 4) The facility must also determine the organic HAP mass fraction of each coating material "as-applied" by assuming the as-applied organic HAP mass fraction is equal to the as-purchased organic HAP mass fraction if the as-purchased coating is applied to the web without adding solvents or other materials. Otherwise, the as-applied organic HAP mass fraction must be calculated using Equation 1a of

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



§63.3370.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 62: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3360(d), Subpart JJJJ**

**Item 62.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002

Process: 021

Emission Unit: 0-00002

Process: 022

Emission Unit: 0-00002

Process: 026

Emission Unit: 0-00005

Process: 030

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 62.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility determines compliance with the emission standards in §63.3320 by means other than determining the organic HAP control efficiency of a control device and the facility chooses to use the volatile organic content as a surrogate for the organic HAP content of the coatings, the facility must determine the as-purchased volatile organic content and coating solids content of each coating material applied by following these procedures:

1) The facility may determine the volatile organic and coating solids mass fraction of each coating applied using Method 24 of 40CFR60, appendix A. The Method 24



determination may be performed by the manufacturer of the material and the results provided to the facility. If these values cannot be determined using Method 24, the facility must submit an alternative technique for determining their values for approval by EPA.

2) The facility may determine the volatile organic content and coating solids content of a coating material based on formulation data and may rely on volatile organic content data provided by the manufacturer of the material. In the event of any inconsistency between the formulation data and the results of Method 24, and the Method 24 results are higher, the results of Method 24 will govern.

3) If the as-purchased coating material is applied to the web without any solvent or other material added, then the as-applied volatile organic content is equal to the as-purchased volatile content and the as-applied coating solids content is equal to the as-purchased coating solids content. Otherwise, the as-applied volatile organic content must be calculated using Equation 1b of §63.3370 and the as-applied coating solids content must be calculated using Equation 2 of §63.3370.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 63: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3370(b), Subpart JJJJ**

**Item 63.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002

Process: 021

Emission Unit: 0-00002

Process: 022

Emission Unit: 0-00002

Process: 026

Emission Unit: 0-00005

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Process: 030

Regulated Contaminant(s):

CAS No: ONY100-00-0 TOTAL HAP

**Item 63.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

If the facility chooses to comply by using coating materials that individually meet the emission standards in §63.3320(b)(2) or (3), the facility must demonstrate that each coating material applied during the month at an existing affected source contains no more than 0.04 mass fraction of organic HAP or 0.2 kg organic HAP per kg coating solids, on an as-purchased basis as determined in accordance with §63.3360(c). The facility is in compliance with the emission standards if each coating material satisfies the above criteria and is applied as-purchased.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: 4 percent by weight

Monitoring Frequency: MONTHLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -  
SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 64: Compliance Certification**

**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3370(c), Subpart JJJJ**

**Item 64.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002

Process: 021

Emission Unit: 0-00002

Process: 022

Emission Unit: 0-00002

Process: 026



Emission Unit: 0-00005  
Process: 030

Regulated Contaminant(s):  
CAS No: ONY100-00-0 TOTAL HAP

**Item 64.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility chooses to comply by using coating materials that meet the emission standards in Sec. 63.3320(b)(2) or (3) as-applied, it must demonstrate compliance by following one of the procedures in paragraphs (c)(1) through (4) below. Compliance is determined in accordance with paragraph (c)(5) of this section.

1) Each coating material as-applied meets the mass fraction of coating material standard (Sec. 63.3320(b)(2)). Facility must demonstrate that each coating material applied at an existing affected source during the month contains no more than 0.04 kg organic HAP per kg coating material applied as determined in accordance with paragraphs (1)(i) and (ii) below. Facility must calculate the as-applied organic HAP content of as-purchased coating materials which are reduced, thinned, or diluted prior to application.

(i) Determine the organic HAP content or volatile organic content of each coating material applied on an as-purchased basis in accordance with Sec. 63.3360(c).

(ii) Calculate the as-applied organic HAP content of each coating material using Equation 1a of this section or calculate the as-applied volatile organic content of each coating material using Equation 1b of this section.

2) Each coating material as-applied meets the mass fraction of coating solids standard (Sec. 63.3320(b)(3)). Facility must demonstrate that each coating material applied at an existing affected source contains no more than 0.20 kg of organic HAP per kg of coating solids applied. Facility must demonstrate compliance in accordance with paragraphs (2)(i) and (ii) below.





(i) Determine the as-applied coating solids content of each coating material following the procedure in Sec. 63.3360(d). You must calculate the as-applied coating solids content of coating materials which are reduced, thinned, or diluted prior to application, using Equation 2 of this section.

(ii) Calculate the as-applied organic HAP to coating solids ratio using Equation 3 of this section.

3) Monthly average organic HAP content of all coating materials as-applied is less than the mass percent limit (Sec. 63.3320(b)(2)). Facility must demonstrate that the monthly average as-applied organic HAP content of all coating materials applied at an existing affected source is less than 0.04 kg organic HAP per kg of coating material applied, as determined by Equation 4 of this section.

4) Monthly average organic HAP content of all coating materials as-applied is less than the mass fraction of coating solids limit (Sec. 63.3320(b)(3)). Facility must demonstrate that the monthly average as-applied organic HAP content on the basis of coating solids applied of all coating materials applied at an existing affected source is less than 0.20 kg organic HAP per kg coating solids applied, as determined by Equation 5 of this section.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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 1/30/2018.

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

**Condition 65: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement: 40CFR 63.3370(c)(5), Subpart JJJJ**

**Item 65.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002

Process: 021

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Emission Unit: 0-00002  
Process: 022

Emission Unit: 0-00002  
Process: 026

Emission Unit: 0-00005  
Process: 030

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

**Item 65.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The affected source is in compliance with emission standards in Sec. 63.3320(b)(2) or (3) if:

(i) The organic HAP content of each coating material as-applied at an existing affected source is no more than 0.04 kg organic HAP per kg coating material or 0.2 kg organic HAP per kg coating solids; or

(ii) The monthly average organic HAP content of all as-applied coating materials at an existing affected source are no more than 0.04 kg organic HAP per kg coating material or 0.2 kg organic HAP per kg coating solids.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: 4 percent by weight

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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 1/30/2018.

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

**Condition 66: Compliance Certification**

**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3400(b), Subpart JJJJ**

**Item 66.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:



Emission Unit: 0-00002  
Process: 021

Emission Unit: 0-00002  
Process: 022

Emission Unit: 0-00002  
Process: 026

Emission Unit: 0-00005  
Process: 030

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

**Item 66.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit an initial notification as required in §63.9(b).

- 1) Existing facilities must submit the initial notification no later than December 5, 2004.
- 2) New and reconstructed affected sources must submit the initial notification according to the appropriate schedule in §63.9(b).
- 3) For the purpose of Subpart JJJJ, a Title V or Part 70 permit application may be used in lieu of the initial notification required in §63.9(b). If the facility is using a permit application in lieu of an initial notification the permit application must be submitted by the same due date specified for the initial notification.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 67: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3400(c)(1), Subpart JJJJ**

**Item 67.1:**

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

Emission Unit: 0-00002  
Process: 021

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Emission Unit: 0-00002  
Process: 022

Emission Unit: 0-00002  
Process: 026

Emission Unit: 0-00005  
Process: 030

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

**Item 67.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a semiannual compliance report according to the schedule below.

(i) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in Sec. 63.3330 and ending on June 30 or December 31, whichever date is the first date following the end of the calendar half immediately following the compliance date that is specified for your affected source in Sec. 63.3330.

(ii) The first compliance report must be post marked or delivered no later than July 31 or January 31, whichever date follows the end of the calendar half immediately following the compliance date that is specified for your affected source in Sec. 63.3330.

(iii) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iv) Each subsequent compliance report must be post marked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(v) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to Sec. 70.6(a)(3)(iii)(A) or Sec. 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has



established instead of according to the dates in paragraphs (i) through (iv) above.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 68: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.3400(c)(2), Subpart JJJJ**

**Item 68.1:**

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

Emission Unit: 0-00002  
Process: 021

Emission Unit: 0-00002  
Process: 022

Emission Unit: 0-00002  
Process: 026

Emission Unit: 0-00005  
Process: 030

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

**Item 68.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The compliance report must contain the information in paragraphs (i) through (vi) below:

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.



(v) For each deviation from an emission limitation (emission limit or operating limit) that applies to the facility and that occurs at an affected source where the facility is not using a CEMS to comply with the emission limitations in this subpart, the compliance report must contain the information in paragraphs (i) through (iii) above, and:

(A) The total operating time of each affected source during the reporting period.

(B) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(C) Information on the number, duration, and cause for CPMS down time incidents, if applicable, other than down time associated with zero and span and other calibration checks.

(vi) For each deviation from an emission limit occurring at an affected source where the facility is using a CEMS to comply with the emission limit in this subpart, the facility must include the information in paragraphs (i) through (iii), above, and paragraphs (A) through (J) below.

(A) The date and time that each malfunction started and stopped.

(B) The date and time that each CEMS and CPMS, if applicable, was inoperative except for zero (low-level) and high-level checks.

(C) The date and time that each CEMS and CPMS, if applicable, was out-of-control, including the information in Sec. 63.8(c)(8).

(D) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(E) A summary of the total duration (in hours) of each deviation during the reporting period and the total duration of each deviation as a percent of the total source operating time during that reporting period.

(F) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(G) A summary of the total duration (in hours) of CEMS and CPMS down time during the reporting period and the total duration of CEMS and CPMS down time as a percent of the total source operating time during that reporting period.

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



(H) A breakdown of the total duration of CEMS and CPMS down time during the reporting period into periods that are due to monitoring equipment malfunctions, non monitoring equipment malfunctions, quality

assurance/quality control calibrations, other known causes, and other unknown causes.

(I) The date of the latest CEMS and CPMS certification or audit.

(J) A description of any changes in CEMS, CPMS, or controls since the last reporting period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 69: Compliance Certification Effective between the dates of 12/01/2017 and 11/30/2022

Applicable Federal Requirement:40CFR 63.3400(e), Subpart JJJJ

Item 69.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002 Process: 021

Emission Unit: 0-00002 Process: 022

Emission Unit: 0-00002 Process: 026

Emission Unit: 0-00005 Process: 030

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

Item 69.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a Notification of Compliance Status report as required in §63.9(h).

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



**Condition 70: Compliance Certification**  
Effective between the dates of 12/01/2017 and 11/30/2022

**Applicable Federal Requirement: 40CFR 63.3410(a), Subpart JJJJ**

**Item 70.1:**

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

Emission Unit: 0-00002  
Process: 021

Emission Unit: 0-00002  
Process: 022

Emission Unit: 0-00002  
Process: 026

Emission Unit: 0-00005  
Process: 030

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

**Item 70.2:**

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 must maintain the records specified in paragraphs (1) and (2), below, on a monthly basis in accordance with the requirements of Sec. 63.10(b)(1):

(1) Records specified in Sec. 63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, including:

- (i) Continuous emission monitor data in accordance with the requirements of Sec. 63.3350(d);
- (ii) Control device and capture system operating parameter data in accordance with the requirements of Sec. 63.3350(c), (e), and (f);
- (iii) Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(c);
- (iv) Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(d);
- (v) Overall control efficiency determination using capture efficiency and control device destruction or



**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



removal efficiency test results in accordance with the requirements of Sec. 63.3360(e) and (f); and  
(vi) Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of Sec. 63.3370(b), (c), and (d).

(2) Records specified in Sec. 63.10(c) for each CMS operated by the owner or operator in accordance with the requirements of Sec. 63.3350(b).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

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

**Condition 71: Emission Point Definition By Emission Unit  
Effective between the dates of 12/01/2017 and 11/30/2022**

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

**Item 71.1:**

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

Emission Unit: 0-00001

Emission Point: 00001

Height (ft.): 50

Diameter (in.): 20

NYTMN (km.): 4849.006 NYTME (km.): 460.755

Emission Point: 00002

Height (ft.): 65

Diameter (in.): 20

NYTMN (km.): 4849.048 NYTME (km.): 460.754

**Item 71.2:**

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

Emission Unit: 0-00002

Emission Point: 00024

Height (ft.): 42

Diameter (in.): 18

NYTMN (km.): 4849.001 NYTME (km.): 460.782 Building: #7

Emission Point: 00033

Height (ft.): 45

Diameter (in.): 11

NYTMN (km.): 4848.985 NYTME (km.): 460.753 Building: #7



Emission Point: 00034  
Height (ft.): 45 Diameter (in.): 11  
NYTMN (km.): 4848.986 NYTME (km.): 460.775 Building: #7

Emission Point: 00035  
Height (ft.): 45 Diameter (in.): 11  
NYTMN (km.): 4848.967 NYTME (km.): 460.754 Building: #7

Emission Point: 00036  
Height (ft.): 45 Diameter (in.): 11  
NYTMN (km.): 4848.966 NYTME (km.): 460.778 Building: #7

Emission Point: 00037  
Height (ft.): 45 Diameter (in.): 11  
NYTMN (km.): 4848.983 NYTME (km.): 460.798 Building: #7

Emission Point: 00038  
Height (ft.): 45 Diameter (in.): 11  
NYTMN (km.): 4848.965 NYTME (km.): 460.797 Building: #7

Emission Point: 00039  
Height (ft.): 45 Diameter (in.): 11  
NYTMN (km.): 4848.967 NYTME (km.): 460.817

Emission Point: 00040  
Height (ft.): 45 Diameter (in.): 11  
NYTMN (km.): 4848.965 NYTME (km.): 460.835

Emission Point: 00041  
Height (ft.): 43 Diameter (in.): 16  
NYTMN (km.): 4848.95 NYTME (km.): 460.757 Building: #12

Emission Point: 00042  
Height (ft.): 39 Diameter (in.): 6  
NYTMN (km.): 4848.95 NYTME (km.): 460.772 Building: #12

Emission Point: 00043  
Height (ft.): 39 Diameter (in.): 6  
NYTMN (km.): 4848.951 NYTME (km.): 460.796

Emission Point: 00044  
Height (ft.): 36 Diameter (in.): 6  
NYTMN (km.): 4848.953 NYTME (km.): 460.812 Building: #12

Emission Point: 00045  
Height (ft.): 36 Diameter (in.): 6  
NYTMN (km.): 4848.949 NYTME (km.): 460.83 Building: #12

**Item 71.3:**

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

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Emission Unit: 0-00003

Emission Point: 00016

Height (ft.): 25 Length (in.): 12 Width (in.): 12  
NYTMN (km.): 4849.156 NYTME (km.): 460.772

Emission Point: 00031

Height (ft.): 28 Length (in.): 16 Width (in.): 16  
NYTMN (km.): 4849.156 NYTME (km.): 460.752

**Item 71.4:**

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

Emission Unit: 0-00005

Emission Point: 00048

Height (ft.): 43 Diameter (in.): 17  
NYTMN (km.): 4849.088 NYTME (km.): 460.783 Building: MAIN

Emission Point: 00049

Height (ft.): 43 Diameter (in.): 17  
NYTMN (km.): 4849.085 NYTME (km.): 460.772 Building: MAIN

Emission Point: 00050

Height (ft.): 43 Diameter (in.): 14  
NYTMN (km.): 4849.111 NYTME (km.): 460.757 Building: MAIN

Emission Point: 00052

Height (ft.): 43 Diameter (in.): 18  
NYTMN (km.): 4849.122 NYTME (km.): 460.749 Building: MAIN

Emission Point: 00054

Height (ft.): 43 Diameter (in.): 12  
NYTMN (km.): 4849.078 NYTME (km.): 460.753 Building: MAIN

Emission Point: 00055

Height (ft.): 43 Diameter (in.): 24  
NYTMN (km.): 4849.069 NYTME (km.): 460.749 Building: MAIN

Emission Point: 00056

Height (ft.): 31 Diameter (in.): 2  
NYTMN (km.): 4849.063 NYTME (km.): 460.769

**Condition 72: Process Definition By Emission Unit**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

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

**Item 72.1:**

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

Emission Unit: 0-00001



Process: 012 Source Classification Code: 1-03-006-02

Process Description:

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

Emission Source/Control: BLR01 - Combustion

Emission Source/Control: BLR02 - Combustion

**Item 72.2:**

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

Emission Unit: 0-00002

Process: 021

Source Classification Code: 4-02-013-01

Process Description:

This process includes 1 operational coater at the plant. Inside coater 11; coating is applied to a paper or other substrate and then dried to create a rigid or semi-rigid binder for books and folders.

Emission Source/Control: CTR11 - Process

**Item 72.3:**

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

Emission Unit: 0-00002

Process: 022

Source Classification Code: 4-02-013-01

Process Description:

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

Emission Source/Control: CR2AQ - Process

Design Capacity: 11,000 feet per hour

Emission Source/Control: CR8AQ - Process

Design Capacity: 11,000 feet per hour

**Item 72.4:**

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

Emission Unit: 0-00002

Process: 024

Source Classification Code: 4-02-013-01

Process Description:

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



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

Emission Source/Control: PR4AQ - Process  
Design Capacity: 11,000 feet per hour

**Item 72.5:**

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

Emission Unit: 0-00002  
Process: 026 Source Classification Code: 4-02-013-01  
Process Description:

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

Emission Source/Control: PR4AQ - Process  
Design Capacity: 11,000 feet per hour

**Item 72.6:**

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

Emission Unit: 0-00002  
Process: 028 Source Classification Code: 3-01-020-17  
Process Description:

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

Emission Source/Control: CR2AQ - Process  
Design Capacity: 11,000 feet per hour

Emission Source/Control: CR8AQ - Process  
Design Capacity: 11,000 feet per hour

Emission Source/Control: CTR11 - Process  
Design Capacity: 1,600 yards

Emission Source/Control: PR4AQ - Process  
Design Capacity: 11,000 feet per hour

**Item 72.7:**

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

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Emission Unit: 0-00003

Process: 031

Source Classification Code: 4-02-013-03

Process Description:

Designated areas in the plant are used for the blending and mixing of solvent based and water based coatings.

Emission Source/Control: WTR01 - Process

Emission Source/Control: WTR02 - Process

**Item 72.8:**

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

Emission Unit: 0-00005

Process: 030

Source Classification Code: 4-02-013-01

Process Description:

This process includes Printer/Coater 3AQ (previously Coater #5), the Tandem Coater, Printer #1 and Printer #2, print heads and associated floor sweeps that utilize multiple coating stations to apply coatings to paper or other substrates. Once the coatings are applied, the web enters multiple zone gas fired dryers; the web is then cooled and finally rewound.

Emission Source/Control: CR3AQ - Process

Design Capacity: 3,600 linear yards per hour

Emission Source/Control: DMDSP - Process

Emission Source/Control: DMFTR - Process

Emission Source/Control: PTR01 - Process

Design Capacity: 3,600 linear yards per hour

Emission Source/Control: PTR02 - Process

Design Capacity: 3,600 linear yards per hour

Emission Source/Control: PTRHD - Process

Emission Source/Control: TDCTR - Process

Design Capacity: 3,600 linear yards per hour

Emission Source/Control: WWTTK - Process

**Item 72.9:**

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

Emission Unit: 0-00005

Process: 032

Source Classification Code: 4-02-820-02

Process Description:

Wash down water from aqueous coating and printing lines

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



is treated by pH adjustment to precipitate metals, which are removed using two rotary vacuum drum filters prior to discharge.

Emission Source/Control: DMFTR - Process

Emission Source/Control: WWTTK - Process

**Item 72.10:**

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

Emission Unit: 0-00005

Process: 033

Source Classification Code: 4-02-013-04

Process Description:

This process includes the dispensing of coating and ink solutions into 55-gallon drums in the facility's color mix room. Raw materials and previously mixed formulations are added to the drums utilizing automatic and manual dispensing systems. Prior to dispensing, raw materials are combined and mixed into solution to match formulations. The raw materials are stored utilizing: larger storage tanks, tote bins, drums and pails. All of the equipment used prior to dispensing already exists or is exempt from permitting. After dispensing, the solutions are transported for use at the coating and printing equipment. One dispenser is also located in the printer area.

Emission Source/Control: DMDSP - Process

**Item 72.11:**

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

Emission Unit: 0-00005

Process: 034

Source Classification Code: 4-05-005-01

Process Description:

This process includes Printer/Coater 3AQ (previously Coater #5), Printer #1, Printer #2, print heads and associated floor sweeps that utilize multiple stations to apply inks to paper and other substrates by using knife and rotogravure printing. Once the print is applied the web enters multiple zone gas fired dryers; the web is then cooled and finally rewound.

Emission Source/Control: CR3AQ - Process

Design Capacity: 3,600 linear yards per hour

Emission Source/Control: PTR01 - Process

Design Capacity: 3,600 linear yards per hour

Emission Source/Control: PTR02 - Process

Design Capacity: 3,600 linear yards per hour

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Emission Source/Control: PTRHD - Process

Emission Source/Control: TDCTR - Process  
Design Capacity: 3,600 linear yards per hour

**Condition 73: Emission Unit Permissible Emissions**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 73.1:**

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 0-00005

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 72,000 pounds per year

**Condition 74: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 227-1.3 (a)**

**Item 74.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

**Item 74.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one-six-minute period per hour of not more than 27 percent opacity.

In addition, the Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the



**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: Method 9  
Monitoring Frequency: DAILY  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2018.  
Subsequent reports are due every 6 calendar month(s).

**Condition 75: Corrective Action**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 227-1.6**

**Item 75.1:**  
This Condition applies to Emission Unit: 0-00001

**Item 75.2:**  
(a) Any person found to have violated any provision of this Part shall not cause, permit or allow operation of the stationary combustion installation involved in the violation unless:

- (1) it is equipped with approved emission control equipment;
- (2) it is rehabilitated or upgraded in an approved manner; or
- (3) the fuel is changed to an acceptable type.

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



(b) The commissioner may seal such stationary combustion installation so as to prevent any operation if the conditions of paragraph (a)(1)-(3) above are not met within the time provided by the order of final determination issued in the case of the violation.

(c) No person shall cause, permit or allow operation of any stationary combustion installation sealed by the commissioner in accordance with this section.

(d) No person except the commissioner or his representative shall remove, tamper with or destroy any seal affixed to any stationary combustion installation.

**Condition 76: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.7500(a)(1), Subpart DDDDD**

**Item 76.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

**Item 76.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Boilers with a heat input capacity of 10 million Btu per hour or greater must conduct an annual tune-up as specified in 40 CFR 63.7540(a)(10) and must be conducted no more than 13 months after the previous tune-up. New or reconstructed boilers must conduct the first annual tune-up no later than 13 months after the initial startup of the affected source.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 77: Good air pollution control practices**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.7500(a)(3), Subpart DDDDD**

**Item 77.1:**  
This Condition applies to Emission Unit: 0-00001

**Item 77.2:**  
At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**Condition 78: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.7530(d), Subpart DDDDD**

**Item 78.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

**Item 78.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an existing unit with a heat input capacity of less than 10 million Btu per hour or a unit in the unit designed to burn gas 1 subcategory must submit a signed statement in the Notification of Compliance Status report that indicates that he/she conducted a tune-up of the unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 79: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.7530(e), Subpart DDDDD**

**Item 79.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

**Item 79.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must include with the Notification of Compliance Status a signed certification that the energy assessment was completed according to Table 3 to

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



subpart DDDDD and is an accurate depiction of the facility at the time of the assessment.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 80: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.7550(c), Subpart DDDDD**

**Item 80.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

**Item 80.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All compliance reports for 40 CFR 63 Subpart DDDDD must contain the information required in 40 CFR 63.7550(c)(1) through (5).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 81: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.7550(d), Subpart DDDDD**

**Item 81.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

**Item 81.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each deviation from an emission limit or operating limit in this subpart that occurs at an individual boiler or process heater where the owner or operator is not using a CMS to comply with that emission limit or operating limit, the compliance report must additionally contain the information required in following paragraphs (1) through (3).

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



(1) A description of the deviation and which emission limit or operating limit from which the owner or operator deviated.

(2) Information on the number, duration, and cause of deviations (including unknown cause), as applicable, and the corrective action taken.

(3) If the deviation occurred during an annual performance test, provide the date the annual performance test was completed.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 82: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.7555(a), Subpart DDDDD**

**Item 82.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

**Item 82.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must keep records according to paragraphs (1) and (2).

(1) A copy of each notification and report that was submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).

(2) Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 83: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**



**Applicable Federal Requirement:40CFR 63.7560, Subpart DDDDD**

**Item 83.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00001

**Item 83.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1).

As specified in 40 CFR 63.10(b)(1), the owner or operator must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

The owner or operator must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The owner or operator can keep the records off site for the remaining 3 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 84: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:6 NYCRR 234.3 (a) (1) (i)**

**Item 84.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

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

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



**Item 84.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

A packaging rotogravure, publication rotogravure, or flexographic printing process that uses ink, coating or adhesive containing VOC shall not operate if it: is located in a severe ozone non-attainment area; has an annual potential to emit VOC of 25 tons per year or more; or is located in a facility that has an annual potential to emit VOC of 50 tons per year or more, unless the printing process uses an ink, coating or adhesive with a low VOC content equal to or less than 0.8 kilograms of VOC per kilogram of solids as applied (0.8 kg VOC/ kg solids as applied).

VOC content limits can be met by averaging the VOC content of materials used on a single press (i.e., within a line).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: VOC

Upper Permit Limit: 0.8 kilograms VOC per kilogram solids applied

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 85: Compliance Certification**

**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement: 6 NYCRR 234.3 (e) (1) (i) ('a')**

**Item 85.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002  
Process: 024

Emission Unit: 0-00005  
Process: 034

Regulated Contaminant(s):



CAS No: 0NY998-00-0 VOC

**Item 85.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The maximum permitted pounds of VOC per gallon of ink, coating or adhesive, minus water and excluded compounds, at application is 3.3 pounds as applied to paper, glass, metal, plastic, vinyl, reflective sheeting, textile/imprinted garments or pressure sensitive decals.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.3 pounds per gallon

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 86: Compliance Certification**

**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement: 6 NYCRR 234.4 (b)**

**Item 86.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-00002

Process: 024

Emission Unit: 0-00005

Process: 034

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 86.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a printing process subject to this Part must follow notification requirements and test





procedures in Part 202-1 of this Title.

One of the following test methods from appendix A of 40 CFR 60 (see Table I, 6 NYCRR Part 200.9) must be used to measure the VOC concentration of a gas stream at the inlet and outlet of the control equipment:

- (i) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;
- (ii) Method 25, Determination of Total Gaseous Non-methane Organic Emissions as Carbon; or
- (iii) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.
- (iv) Methods not listed above must be approved in advance by the Department and the United States Environmental Protection Agency.

Acceptable analytical methods for determining the VOC content, water content, density, volume of solids and weight of solids of surface coatings and printing inks are presented in appendix A, methods 24 and 24A (as appropriate), of 40 CFR 60 (see Table I, 6 NYCRR Part 200.9). Alternate analytical methods for surface coating and printing ink analysis must be approved by the Department and the United States Environmental Protection Agency. Instead of analytical methods, the Department may accept the manufacturer's certification of VOC content of ink coating or adhesives, if supported by actual batch records.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 87: Part 63 General Provisions requirements  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.823, Subpart KK**

**Item 87.1:**

This Condition applies to Emission Unit: 0-00002  
Process: 024

**Item 87.2:**

Table 1 to 40CFR63 Subpart KK provides cross references to the 40CFR Part 63 Subpart A, General Provisions, indicating the applicability of the General Provisions requirements to Subpart KK.

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



**Condition 88: Overall requirements for subpart HHHHH**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.8000(a), Subpart HHHHH**

**Item 88.1:**

This Condition applies to Emission Unit: 0-00003  
Process: 031

**Item 88.2:**

The facility must be in compliance with the emission limits and work practice standards in table 1-5 of subpart HHHHH at all times, except during periods of startup, shutdown, and malfunction.

The facility shall meet the requirements specified in §63.8000(b) and (c).

The facility must meet the requirements specified in §63.8005-8025 or meet the alternative means of compliance in §63.8050 - except as specified in §63.8000(d).

The facility must meet the notification, reporting, and recordkeeping requirements specified in §63.8070, 63.8075, and 63.8080.

**Condition 89: Opening of safety devices**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.8000(b), Subpart HHHHH**

**Item 89.1:**

This Condition applies to Emission Unit: 0-00003  
Process: 031

**Item 89.2:**

Opening of a safety device, as defined in §63.8105, is allowed at any time conditions require it to avoid unsafe conditions.

**Condition 90: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.8005(a), Subpart HHHHH**

**Item 90.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003  
Process: 031

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

**Item 90.2:**

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- (i) You are not required to meet the emission limits and work practice standards in Table 1 to this subpart if you comply with §63.8050 or §63.8055.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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 1/30/2018.

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

**Condition 91: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.8055, Subpart HHHHH**

**Item 91.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00003

Process: 031

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 91.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

- (a) As an alternative to complying with the requirements in Table 1 to this subpart for each individual stationary process vessel at an existing source, you may elect to comply with a 5 weight percent HAP limit for process vessels at your affected source that are used to manufacture coatings with a HAP content of less than 0.05 kg per kg product as specified in paragraph (b) of this section.

- (b) You may only comply with the alternative during the production of coatings that contain less than 5 weight percent HAP, as determined using any of the procedures specified in paragraphs (b)(1) through (4) of this section.



- (1) Method 311 (appendix A to 40 CFR part 63).
- (2) Method 24 (appendix A to 40 CFR part 60). You may use Method 24 to determine the mass fraction of volatile matter and use that value as a substitute for the mass fraction of HAP.
- (3) You may use an alternative test method for determining mass fraction of HAP if you obtain prior approval by the Administrator. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.
- (4) You may rely on formulation data from raw material suppliers if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4), and at 1.0 percent by mass or more for other compounds. If the HAP weight percent estimated based on formulation data conflicts with the results of a test conducted according to paragraphs (b)(1) through (3) of this section, then there is a rebuttal presumption that the test results are accurate unless, after consultation, you demonstrate to the satisfaction of the permitting authority that the test results are not accurate and that the formulation data are more appropriate.

Parameter Monitored: TOTAL HAP  
Upper Permit Limit: 5 percent by weight  
Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE  
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 1/30/2018.  
Subsequent reports are due every 6 calendar month(s).

**Condition 92: General provisions applicability**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement: 40CFR 63.8095, Subpart HHHHH**

**Item 92.1:**  
This Condition applies to Emission Unit: 0-00003  
Process: 031

**Item 92.2:**  
Table 10 of subpart HHHHH lists which parts of the general provisions listed in §63.1-15 of subpart A apply to the facility.

**Condition 93: Capping Monitoring Condition**



Effective between the dates of 12/01/2017 and 11/30/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-7

**Item 93.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 231-2.2 (a) (4)

**Item 93.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 93.3:**

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.

**Item 93.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 93.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 93.6:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00005

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 93.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility owner shall ensure that emissions from Emission

New York State Department of Environmental Conservation

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



unit 00005 of Volatile Organic Compounds (VOC), including those from permitted, exempt, and trivial sources, remain less than 72,000 pounds during any consecutive 12 month period.

Facility owner must maintain records that verify the Emission unit 00005 monthly VOC emissions. These records must be maintained at the facility for a period of five years.

Reports will be submitted annually, in a format acceptable to the commissioner's representative, which document that Emission unit 00005 VOC emissions over any consecutive 12 month period were below 72,000 pounds. The annual reports must include information that documents the VOC emissions from each emission source in Emission unit 00005, including exempt and trivial activities. The report must also include all emission factors and other data used in calculating the monthly VOC emissions.

Any noncompliance with the VOC emission limit in this condition must be reported by sending a copy of such record to the NYSDEC, Region 6, within 30 days of the occurrence.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 72000 pounds per year

Reference Test Method: EPA RM 24

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 1/30/2018.

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

**Condition 94: Compliance Certification**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement: 6 NYCRR 228-1.4 (d) (3)**

**Item 94.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 0-00005

Process: 030

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 94.2:**

Compliance Certification shall include the following monitoring:

**New York State Department of Environmental Conservation**

Permit ID: 6-2336-00028/00051

Facility DEC ID: 6233600028



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

Monitoring Description:

The facility applying coatings to paper film may not use coatings with VOC contents, as applied, which exceed 0.08 lbs VOC/lb coating. The units in table D-2 are in terms of weight of VOC per weight of coating applied.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 0.08 pounds of VOC per pound of coating

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 95: Part 63 General Provisions requirements  
Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable Federal Requirement:40CFR 63.823, Subpart KK**

**Item 95.1:**

This Condition applies to Emission Unit: 0-00005  
Process: 034

**Item 95.2:**

Table 1 to 40CFR63 Subpart KK provides cross references to the 40CFR Part 63 Subpart A, General Provisions, indicating the applicability of the General Provisions requirements to Subpart KK.



**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 by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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





standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

**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 96: Contaminant List**

**Effective between the dates of 12/01/2017 and 11/30/2022**

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

**Item 96.1:**

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

CAS No: 000050-00-0  
Name: FORMALDEHYDE

CAS No: 0NY075-00-0  
Name: PARTICULATES

CAS No: 0NY075-00-5  
Name: PM-10

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

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

**Condition 97: Malfunctions and start-up/shutdown activities**

**Effective between the dates of 12/01/2017 and 11/30/2022**

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



**Item 97.1:**

(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 malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, 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 stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and 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. 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, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the 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 98: Visible Emissions Limited**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 98.1:**

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 99: Compliance Demonstration**  
**Effective between the dates of 12/01/2017 and 11/30/2022**



**Applicable State Requirement:6 NYCRR 212-2.3 (b)**

**Item 99.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 000050-00-0 FORMALDEHYDE

**Item 99.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of Formaldehyde from this facility shall not exceed 1306 pounds during any consecutive 12 month period. This limit is based on the determination of Formaldehyde to be an A-rated contaminant and that the facility is applying Best Available Control Technology. Source owner shall determine compliance with this limit by using an emission factor, developed during a September 2003 stack test on emission points 00033 & 00034 while utilizing the highest formaldehyde containing coating. This emission factor, correlated to the actual formaldehyde content of each coating, will be utilized to calculate the formaldehyde emissions at any time formaldehyde containing coatings are applied at the facility.

Parameter Monitored: FORMALDEHYDE  
Upper Permit Limit: 1306 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 1/30/2018.  
Subsequent reports are due every 6 calendar month(s).

**Condition 100: Exceptions**  
**Effective between the dates of 12/01/2017 and 11/30/2022**

**Applicable State Requirement:6 NYCRR 217-3.3**

**Item 100.1:**

The prohibitions of section 217-3.2 shall not apply when:

(a) A bus or truck is forced to remain motionless because of the traffic conditions over which the operator thereof has no control.

(b) Regulations adopted by Federal, State or local agencies having jurisdiction require the maintenance of a specific temperature for passenger comfort. The idling time specified in section 217-3.2 may be increased, but only to the extent necessary to comply with such regulations.

**New York State Department of Environmental Conservation**

**Permit ID: 6-2336-00028/00051**

**Facility DEC ID: 6233600028**



(c) A diesel engine is being used to provide power for an auxiliary purpose, such as loading, discharging, mixing or processing cargo; controlling cargo temperature; construction; lumbering; oil or gas well servicing; farming; or when operation of the engine is required for the purpose of maintenance.

(d) Fire, police and public utility trucks or other vehicles are performing emergency services.

(e) Trucks owned or operated by persons engaged in mining and quarrying are used within the confines of such person's property.

(f) A truck is to remain motionless for a period exceeding two hours, and during which period the ambient temperature is continuously below 25oF.

(g) A heavy duty diesel vehicle, as defined in subdivision 217-5.1(o), that is queued for or is undergoing a state authorized periodic or roadside diesel emissions inspection pursuant to Subpart 217-5.

(h) A hybrid electric vehicle, as defined in subdivision 217-5.1(r), idling for the purpose of providing energy for battery or other form of energy storage recharging.