

Facility DEC ID: 8262200202

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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility

Permit ID: 8-2622-00202/00001

Effective Date:

Expiration Date:

Permit Issued To: AMERICAN PACKAGING CORP  
103 W BROAD ST  
STORY CITY, IA 50248

Contact: LORI LIVECCHI  
100 APC DR  
CHURCHVILLE, NY 14428  
(515) 733-1417

Facility: AMERICAN PACKAGING CORP  
100 APC DR  
CHURCHVILLE, NY 14428

Contact: LORI LIVECCHI  
100 APC DR  
CHURCHVILLE, NY 14428  
(515) 733-1417

Description:

Renewal 1 of the Air Title V (ATV) Permit for the American Packaging Corp. facility located at 100 APC Drive, Churchville, NY 14428, which manufactures and prints various industrial and commercial packaging. Facility operations are included under one emission unit (A-00001). This renewal incorporates the proposed changes requested as part of a minor modification application submitted to the Department in September 2021. This modification was not issued prior to the renewal application being received and is therefore being processed as part of the renewal.

The minor modification is for the installation and operation of two (2) new extrusion coating lines with corona treaters and a third thermal oxidizer for emissions control. Additionally, the modification includes the installation of a sleeve washer which was included in the initial ATV permit but never constructed. The new extrusion coating lines, corona treaters, and thermal oxidizer are identical in operation to the existing sources and controls and are included under the existing single Emission Unit (A-00001). The Project Emission Potential (PEP) VOC emissions (i.e., PTE emissions) for this modification are less than the 40 tons per year Significant Project Threshold in 231-13 and therefore this project is not subject to New Source Review requirements under 6 NYCRR 231-6. Additionally, the facility will continue to comply with 70 tpy VOC limit established in the initial ATV permit and therefore the project will not result in an increase in PTE VOC emissions.

The proposed extrusion coating lines, and corona treaters will be contained within permanent total enclosure with 100% capture efficiency and exhaust to one of the thermal oxidizers with a destruction efficiency of 98%. This level of capture and control is consistent with the LAER determination established in the initial permit for the existing coating and printing sources.

**Facility DEC ID: 8262200202**

Additionally, these sources are subject to the same requirements as the same sources in existing process EX1 and OZ1.

The permit-exempt emergency generator is subject to 40 CFR 60, Subpart JJJJ NSPS for Industrial, Institutional and Commercial Stationary Internal Combustion Engines. The facility must comply with the applicable requirements of the 40 CFR 60, Subpart JJJJ

Relocation or removal of permit conditions have been made where necessary as part of this renewal to reflect the above changes. Prior permits erroneously contained Emission Source ALDP2 which corresponds to a source that does not exist. This source has been removed from the permit as part of this Renewal. Additionally, emission source/control IDs have been assigned for the existing and proposed permanent total enclosures. Miscellaneous changes to permit conditions have been made to reflect updated regulations or to improve clarity.

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:           KIMBERLY A MERCHANT  
6274 E AVON LIMA RD  
AVON, NY 14414-9519

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

Facility DEC ID: 8262200202

**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.

Facility DEC ID: 8262200202

**PAGE LOCATION OF CONDITIONS**

**PAGE**

**DEC GENERAL CONDITIONS**

**General Provisions**

- 5 1 Facility Inspection by the Department
- 5 2 Relationship of this Permit to Other Department Orders and Determinations
- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Permit modifications, suspensions or revocations by the Department

**Facility Level**

- 6 5 Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS

Facility DEC ID: 8262200202

**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

Facility DEC ID: 8262200202

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 8**  
**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 8 Headquarters  
Division of Environmental Permits  
6274 Avon-Lima Road  
Avon, NY 14414-9519  
(585) 226-2466

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: AMERICAN PACKAGING CORP  
103 W BROAD ST  
STORY CITY, IA 50248

Facility: AMERICAN PACKAGING CORP  
100 APC DR  
CHURCHVILLE, NY 14428

Authorized Activity By Standard Industrial Classification Code:  
2759 - COMMERCIAL PRINTING, NEC

Permit Effective Date:

Permit Expiration Date:

**PAGE LOCATION OF CONDITIONS**

**PAGE**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

7	1	6 NYCRR 200.6: Acceptable Ambient Air Quality
8	2	6 NYCRR 201-6.4 (a) (7): Fees
8	3	6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
8	4	6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
9	5	6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
11	6	6 NYCRR 201-6.4 (e): Compliance Certification
13	7	6 NYCRR 202-2.1: Compliance Certification
13	8	6 NYCRR 202-2.5: Recordkeeping requirements
13	9	6 NYCRR 215.2: Open Fires - Prohibitions
15	10	6 NYCRR 200.7: Maintenance of Equipment
15	11	6 NYCRR 201-1.7: Recycling and Salvage
15	12	6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
15	13	6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
16	14	6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
16	15	6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
16	16	6 NYCRR 201-6.4 (a) (8): Right to Inspect
17	17	6 NYCRR 202-1.1: Required Emissions Tests
17	18	40 CFR Part 68: Accidental release provisions.
17	19	40CFR 82, Subpart F: Recycling and Emissions Reduction
18	20	6 NYCRR Subpart 201-6: Emission Unit Definition
18	21	6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
18	22	6 NYCRR 201-6.4 (f): Operational Flexibility
19	23	6 NYCRR 201-6.5: Compliance Certification
20	24	6 NYCRR 202-2.4 (a) (3): Statement dates for emissions statements.
20	25	6 NYCRR 211.2: Visible Emissions Limited
20	26	6 NYCRR 212-1.6 (a): Compliance Certification
22	27	6 NYCRR 212-2.3 (b): Compliance Certification
23	28	6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
23	29	6 NYCRR 228-1.3 (d): Compliance Certification
25	30	6 NYCRR 228-1.3 (e) (2): Compliance Certification
26	31	6 NYCRR 228-1.6 (h): Compliance Certification
27	32	6 NYCRR 229.3 (e) (2) (v): VOL storage tanks less than 10000 gallons
27	33	6 NYCRR 231-5.2: Compliance Certification
28	34	6 NYCRR 231-5.4: Compliance Certification
29	35	6 NYCRR 231-5.4: Compliance Certification
31	36	6 NYCRR 231-5.4: Compliance Certification
33	37	6 NYCRR 231-5.4: Compliance Certification
34	38	6 NYCRR 231-5.4: Compliance Certification
35	39	6 NYCRR 231-5.4: Compliance Certification
36	40	6 NYCRR 231-5.4: Compliance Certification
38	41	6 NYCRR 231-5.4: Compliance Certification
39	42	6 NYCRR 231-5.4: Compliance Certification
40	43	6 NYCRR 231-5.4: Compliance Certification



Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

- 41 44 6 NYCRR 231-5.4: Compliance Certification
- 42 45 6 NYCRR 231-5.4: Compliance Certification
- 43 46 6 NYCRR 231-5.4: Compliance Certification
- 44 47 6 NYCRR 234.4 (b): Compliance Certification
- 45 48 6 NYCRR 234.5 (a): Compliance Certification
- 46 49 6 NYCRR 234.6: Compliance Certification
- 47 50 6 NYCRR 234.7: Compliance Certification
- 47 51 6 NYCRR 234.8: Compliance Certification
- 49 52 40CFR 60, NSPS Subpart JJJ: Applicability
- 49 53 40CFR 63, Subpart ZZZZ: Applicability
- Emission Unit Level**
- 49 54 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 50 55 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

**EU=A-00001**

- 55 56 6 NYCRR 212-2.4 (b): Compliance Certification
- 56 57 6 NYCRR 228-1.3 (b) (1): Compliance Certification
- 58 58 6 NYCRR 228-1.6 (a): Compliance Certification

**EU=A-00001**

- 58 59 6 NYCRR 228-1.6 (d): Overall Removal Efficiency
- 60 60 6 NYCRR 228-1.6 (e): VOC content of gas stream test methods

**EU=A-00001,Proc=AL1**

- 60 61 6 NYCRR 228-2.4 (d): Compliance Certification
- 62 62 6 NYCRR 228-2.5 (b): Compliance Certification
- 63 63 6 NYCRR 228-2.5 (c): Compliance Certification
- 64 64 6 NYCRR 228-2.6 (g): Compliance Procedures and Test Methods for Air Pollution Control Equipment

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 66 65 ECL 19-0301: Contaminant List
- 66 66 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 67 67 6 NYCRR 201-6.5 (a): CLCPA Applicability
- 67 68 6 NYCRR 211.1: Air pollution prohibited

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**FEDERALLY ENFORCEABLE CONDITIONS**

Renewal 1/DRAFT

\*\*\*\* 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

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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 for entire length of Permit****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

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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

**Condition 2: Fees  
Effective for entire length of Permit**

**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 for entire length of Permit**

**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 for entire length of Permit**

**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

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

reports required by the permit.

**Condition 5: Compliance Certification**  
**Effective for entire length of Permit**

**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,

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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



Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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

**Condition 6: Compliance Certification  
 Effective for entire length of Permit**

**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;

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

and

- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

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

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

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

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

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
NYSDEC Region 8 Headquarters  
6274 East Avon-Lima Road  
Avon, NY 14414-9519

The address for the BQA is as follows:

NYSDEC  
Bureau of Quality Assurance  
625 Broadway

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2023.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective for entire length of Permit**

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

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 0 days after the reporting period.  
Subsequent reports are due every 12 calendar month(s).

**Condition 8: Recordkeeping requirements**  
**Effective for entire length of Permit**

**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 for entire length of Permit**

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**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**

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**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 for entire length of Permit**

**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 for entire length of Permit**

**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 for entire length of Permit**

**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 for entire length of Permit**

**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

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

them available to representatives of the department upon request.

**Condition 14: Trivial Sources - Proof of Eligibility  
Effective for entire length of Permit**

**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 for entire length of Permit**

**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 for entire length of Permit**

**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.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Condition 17: Required Emissions Tests**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 17.1:**

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 18: Accidental release provisions.**  
**Effective for entire length of Permit**

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

**Item 18.1:**

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:
  - 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 19: Recycling and Emissions Reduction**  
**Effective for entire length of Permit**

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

**Item 19.1:**

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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

**Condition 20: Emission Unit Definition  
Effective for entire length of Permit**

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

**Item 20.1:**

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

Emission Unit: A-00001

Emission Unit Description:

This unit consists three (3) flexographic printing lines, two (2) adhesive laminators, one (1) coater, three (3) coater/extruders, corona treaters, and associated dryers located within permanent total enclosures (capture efficiency of 100%). Emissions exhaust from the permanent total enclosures to one of three (3) regenerative thermal oxidizers.

This unit also includes the following ancillary and/or permit-exempt emission sources that were subject to VOC LAER during initial permitting: Spent solvent distillation unit, anilox washing machine, plate processing distillation unit, flexowash sleeve washer, plate processor, three (3) underground storage tanks, and emergency generator.

Building(s): MAIN

**Condition 21: Progress Reports Due Semiannually  
Effective for entire length of Permit**

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

**Item 21.1:**

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

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

**Condition 22: Operational Flexibility  
Effective for entire length of Permit**



Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Applicable Federal Requirement:6 NYCRR 201-6.4 (f)****Item 22.1:**

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

**Condition 23: Compliance Certification  
Effective for entire length of Permit****Applicable Federal Requirement:6 NYCRR 201-6.5****Item 23.1:**

The Compliance Certification activity will be performed for the Facility.

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

**Item 23.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In acknowledgement of the potential-to-emit and the emissions offsets obtained at the time of initial permitting, facility VOC emissions must not exceed 70 tons per year on a 12-month rolling basis.

To demonstrate compliance with this emissions limit, the facility owner or operator must calculate 12-month rolling VOC emissions on a monthly basis. VOC emissions must be calculated based on material usage data, the control efficiency of the regenerative thermal oxidizers determined during the latest performance test, production records, and emissions factors. Additionally, the facility owner or operator will track of the daily usage of inks, adhesives, lacquers, coatings, and cold seal products used to calculate VOC emissions.

On a semi-annual basis, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed. This certification shall include a summary of the emissions subject to the limit for that time period.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Records of monthly calculations, daily material usage, performance test reports, and other supporting information used to demonstrate compliance with this limit must be kept on-site for a period of at least five years. Records must be made available to the Department upon request.

Parameter Monitored: VOC  
 Upper Permit Limit: 70 tons per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 24: Statement dates for emissions statements.  
 Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 202-2.4 (a) (3)**

**Item 24.1:**

This facility is required to submit an annual emission statement electronically and these emissions statements must be submitted to the department as per the following schedule:

- (i) March 15th of each year for facilities with three or fewer processes listed in their Title V permit:
- (ii) March 31st of each year for facilities with four to six processes listed in their Title V permit:
- (iii) April 15th of each year for facilities with 7 to 12 processes listed in their Title V permit:
- (iv) April 30th of each year for facilities with 13 or more processes listed in their Title V permit.

**Condition 25: Visible Emissions Limited  
 Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 25.1:**

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 26: Compliance Certification  
 Effective for entire length of Permit**

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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

**Item 26.1:**

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

Emission Unit: A-00001	Emission Point: EP001
Emission Unit: A-00001	Emission Point: EP004
Emission Unit: A-00001	Emission Point: EP005
Emission Unit: A-00001	Emission Point: EP006
Emission Unit: A-00001	Emission Point: EP008
Emission Unit: A-00001	Emission Point: EP009
Emission Unit: A-00001	Emission Point: EP010

**Item 26.2:**

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. The Department reserves the right to perform or require the performance of an EPA Reference Test Method 9 opacity evaluation at any time during facility operation.

The facility owner or operator shall conduct a visible emissions observation of all emission points specified by this condition once per day while the process is in operation. The facility owner or operator will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard specified below.

The facility owner or operator 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 limit specified (except the emission of uncombined water) are observed for three consecutive operating days from the same emission point, the facility owner or operator will notify the Department of the observations within one business day. The facility owner or operator will also

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

perform an EPA Reference Test Method 9 opacity evaluation analysis of the affected emission point and submit the results to the Department.

Daily records of the visible emissions observations, any follow-up Method 9 observations, investigations, and corrective actions taken are to be maintained on site for a period of at least five years from the date of the record. Such records shall include the date and time of each observation, weather conditions, results of the observation, corrective actions taken, and explanations for days when weather conditions were prohibitive.

All records kept pursuant to this condition must be provided to the Department upon request.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: EPA Reference Test Method 9  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 27: Compliance Certification**  
**Effective for entire length of Permit**

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

**Item 27.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 27.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

At least 180 days, but not more than eighteen months, prior to the date of permit expiration, the facility owner or operator must submit as part of their next Air Title V permit renewal application an update to the latest air dispersion modeling. This should include a review of facility process sources, their emission rates, and applicability of 6 NYCRR Part 212.

The facility must keep records of air dispersion modeling and any supporting calculations for a period of at least five years. This information must be made available to the Department upon request.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Monitoring Frequency: UPON PERMIT RENEWAL

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 28: Surface Coating- Prohibitions  
Effective for entire length of Permit**

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

**Item 28.1:**

This Condition applies to:

Emission Unit: A00001  
Process: AL1

Emission Unit: A00001  
Process: CT1

Emission Unit: A00001  
Process: EX1

Emission Unit: A00001  
Process: EX2

Emission Unit: A00001  
Process: EX3

**Item 28.2:**

(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 29: Compliance Certification  
Effective for entire length of Permit**

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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

**Item 29.1:**

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

Emission Unit: A-00001  
Process: AL1

Emission Unit: A-00001  
Process: CT1

Emission Unit: A-00001  
Process: EX1

Emission Unit: A-00001  
Process: EX2

Emission Unit: A-00001  
Process: EX3

**Item 29.2:**

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 a facility subject to this Subpart 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

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

surface coatings, or spent VOC solvents;  
 (f) minimize spills during the handling and transfer of coatings and VOC solvents; and  
 (g) clean hand held spray guns by one of the following:  
 (1) an enclosed spray gun cleaning system that is kept closed when not in use;  
 (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;  
 (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or  
 (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 30: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (e) (2)**

**Item 30.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

A facility containing a coating line (other than a class A coating line) may use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits set forth in

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

section 228-1.4 ; provided such use is recorded on an as used basis and maintained at the facility for a period of five years.

Work Practice Type: PROCESS MATERIAL THRUPUT  
Process Material: COATING  
Upper Permit Limit: 55 gallons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 31: Compliance Certification  
Effective for entire length of Permit**

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

**Item 31.1:**

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

Emission Unit: A-00001  
Process: AL1

Emission Unit: A-00001  
Process: CT1

Emission Unit: A-00001  
Process: EX1

Emission Unit: A-00001  
Process: EX2

Emission Unit: A-00001  
Process: EX3

**Item 31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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 32: VOL storage tanks less than 10000 gallons**



Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Effective for entire length of Permit**

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

**Item 32.1:**

Volatile organic liquid tanks with a capacity of less than 10,000 gallons must be equipped with a conservation vent.

**Condition 33: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-5.2**

**Item 33.1:**

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

Emission Unit: A-00001

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:

An applicant for a permit to construct for an air contamination source project subject to 6 NYCRR Part 231 must provide emission offsets as part of the application. Emission offsets are required for any air contaminant for which the area is designated as a nonattainment area if the net increase in annual actual emissions of that contaminant exceeds the 'de minimus' emission limit.

The applicable air contamination source project has potential VOC emissions of greater than the 'de minimus' emission limit of 50 TPY. The project is proposed in a nonattainment area for ozone, therefore emission offsets of volatile organic compounds are required. These may be from any location within the same or contiguous ozone nonattainment area in New York State.

Emission offsets must exceed the net increase in annual actual emissions from the air contamination source project by a ratio of 1.15 to 1.

Emission offsets must be real, permanent, and enforceable to the satisfaction of the commissioner.

The facility owner or operator has accepted a VOC emission

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

limit of 70 TPY, therefore requiring a minimum of 80.5 TPY in VOC Emission Reduction Credits. 88.3 TPY of VOC Emission Reduction Credits have been obtained, in accordance with 6 NYCRR Part 231, from the following facility:

Occidental Chemical Corporation  
 DEC ID# 9-2912-00041

Monitoring Frequency: SINGLE OCCURRENCE  
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 34: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-5.4**

**Item 34.1:**

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

Emission Unit: A-00001 Process: AL1	Emission Source: ENC04
Emission Unit: A-00001 Process: AL1	Emission Source: ENC08
Emission Unit: A-00001 Process: CT1	Emission Source: ENC08
Emission Unit: A-00001 Process: EX1	Emission Source: ENC05
Emission Unit: A-00001 Process: EX2	Emission Source: ENC10
Emission Unit: A-00001 Process: EX3	Emission Source: ENC10
Emission Unit: A-00001 Process: FXP	Emission Source: ENC02
Emission Unit: A-00001 Process: FXP	Emission Source: ENC03
Emission Unit: A-00001 Process: FXP	Emission Source: ENC07
Regulated Contaminant(s): CAS No: 0NY998-00-0	VOC

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Item 34.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emissions from any air contamination source project subject to 6 NYCRR Part 231 must meet the Lowest Achievable Emission Rate (LAER). Consistent with the LAER determination made at the time of initial permitting, VOC LAER for the printing presses, laminators, and corona treaters is 100 percent (%) capture using a Permanent Total Enclosure and 98% destruction efficiency using a regenerative thermal oxidizer (RTO).

To demonstrate compliance with this requirement, the facility owner or operator must conduct a performance test on each Permanent Total Enclosure to verify compliance with the capture efficiency limit. The capture efficiency of each Permanent Total Enclosure will be verified in accordance with EPA Method 204. In accordance with 6 NYCRR 202-1, a test protocol must be submitted to the Department at least 30 days prior to conducting the stack test. A stack test report must be submitted to the Department in triplicate within 60 days of completing the test.

The initial performance test for the proposed Permanent Total Enclosure(s) must be conducted within 180 days of startup. Initial capture efficiency testing was conducted on the existing enclosures using EPA Method 204 on 09/18/2018 and 11/04/2020 and demonstrated compliance. The Department may require subsequent for the enclosures testing upon request.

Records of completed tests and test protocols must be maintained for a period of at least five years and made available to the Department upon request.

Parameter Monitored: CAPTURE EFFICIENCY

Lower Permit Limit: 100 percent

Reference Test Method: EPA Method 204

Monitoring Frequency: Once every five years

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 35: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 231-5.4**



Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

operating temperature. The facility owner or operator must record the reason and duration of any deviations from the limit above and any corrective actions taken.

The temperature monitoring limit is based on the RTO temperature measured during the initial destruction efficiency test required elsewhere in this permit. No later than 30 days following approval of the initial THOX3 destruction efficiency test by the Department, the facility owner or operator must submit an application for a minor modification to incorporate the determined temperature limit into the permit.

The facility must keep records of the RTO temperature measurements during testing, 3-hour block average temperatures, deviations, corrective actions, and any maintenance or calibration. These records must be kept for a period of at least five years and made available to the Department upon request.

Parameter Monitored: TEMPERATURE  
 Lower Permit Limit: 25 degrees F below the approved performance test combustion temperature  
 Monitoring Frequency: CONTINUOUS  
 Averaging Method: 3-HOUR BLOCK AVERAGE  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 36: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 231-5.4**

**Item 36.1:**  
 The Compliance Certification activity will be performed for the facility:  
 The Compliance Certification applies to:

- Emission Unit: A-00001  
 Process: AL1 Emission Source: THOX1
- Emission Unit: A-00001  
 Process: CT1 Emission Source: THOX1
- Emission Unit: A-00001  
 Process: EX1 Emission Source: THOX1
- Emission Unit: A-00001  
 Process: EX2 Emission Source: THOX1
- Emission Unit: A-00001

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Process: EX3 Emission Source: THOX1

Emission Unit: A-00001  
Process: FXP Emission Source: THOX1Emission Unit: A-00001  
Process: OZ1 Emission Source: THOX1Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC**Item 36.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

To ensure proper operation of the regenerative thermal oxidizers (RTOs) and on-going compliance with the 98 percent (%) destruction efficiency limit, the RTO temperature for THOX1 must not fall below 1548 degrees F on a 3-hour block average basis.

To demonstrate compliance with this limit, the facility owner or operator must continuously monitor RTO temperature and incorporate into a 3-hour block average. RTO temperature must be monitored using a continuous monitor that is installed, maintained, and calibrated in accordance with the manufacturer's recommendations.

If the RTO temperature falls below the limit above, the facility owner or operator must take immediate corrective action(s) to restore control equipment to its proper operating temperature. The facility owner or operator must record the reason and duration of any deviations from the limit above and any corrective actions taken.

The temperature monitoring limit is based on the RTO temperature measured during the latest approved destruction efficiency test. This limit may be changed based on the results of subsequent RTO destruction efficiency testing required elsewhere in this permit.

The facility must keep records of 3-hour block average temperatures, deviations, corrective actions, and any maintenance or calibration. These records must be kept for a period of at least five years and made available to the Department upon request.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1548 degrees Fahrenheit

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Monitoring Frequency: CONTINUOUS  
 Averaging Method: 3-HOUR BLOCK AVERAGE  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 37: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-5.4**

**Item 37.1:**

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

Emission Unit: A-00001	
Process: AL1	Emission Source: ENC04
Emission Unit: A-00001	
Process: AL1	Emission Source: ENC08
Emission Unit: A-00001	
Process: CT1	Emission Source: ENC08
Emission Unit: A-00001	
Process: EX1	Emission Source: ENC05
Emission Unit: A-00001	
Process: EX2	Emission Source: ENC10
Emission Unit: A-00001	
Process: EX3	Emission Source: ENC10
Emission Unit: A-00001	
Process: FXP	Emission Source: ENC02
Emission Unit: A-00001	
Process: FXP	Emission Source: ENC03
Emission Unit: A-00001	
Process: FXP	Emission Source: ENC07
Regulated Contaminant(s):	
CAS No: 0NY998-00-0	VOC

**Item 37.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

To ensure proper operation of the permanent total

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

enclosures and on-going compliance with the 100 percent (%) capture efficiency limit, the static pressure for each permanent total enclosure must be maintained at or below -0.01 inches of water on a 3-hour block average basis.

To demonstrate compliance with this limit the facility owner or operator must continuously monitor the static pressure of the permanent total enclosures while the process and RTOs are in operation. Static pressure readings must be recorded at minimum once every 15 minutes and incorporated into a three 3-hour block average. The static pressure is the measure of the pressure differential at the interface between the wall of the enclosure and the surrounding atmosphere. The static pressure gauge must be installed, calibrated, and maintained according to the manufacturer's recommendations and/or established operating procedures.

The facility owner or operator will investigate, in a timely manner, any instance where the 3-hour average static pressure is above -0.01 inches of water. This investigation must determine the cause, make any necessary corrections, and verify that the issue has been corrected.

The facility owner or operator must record the reason and duration of any deviations from the limit above and any corrective actions taken.

The facility must keep records of static pressure (recorded values and 3-hour block averages), deviations, corrective actions, and any maintenance or calibration. These records must be kept for a period of at least five years and made available to the Department upon request.

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: -0.01 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 38: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-5.4**

**Item 38.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001



Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Item 38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Calibration and/or validation checks of continuous parameter monitoring instruments (i.e, RTO temperature monitors and enclosure static pressure gauges) must be completed on an annual basis. Annual checks must be completed according to the manufacturer's recommendations. Records of annual checks must be kept for a period of at least five years and made available to the Department upon request.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 39: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 231-5.4**

**Item 39.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001	
Process: AL1	Emission Source: THOX2
Emission Unit: A-00001	
Process: CT1	Emission Source: THOX2
Emission Unit: A-00001	
Process: EX1	Emission Source: THOX2
Emission Unit: A-00001	
Process: EX2	Emission Source: THOX2
Emission Unit: A-00001	
Process: EX3	Emission Source: THOX2
Emission Unit: A-00001	
Process: FXP	Emission Source: THOX2
Emission Unit: A-00001	
Process: OZ1	Emission Source: THOX2
Regulated Contaminant(s):	
CAS No: 0NY998-00-0	VOC

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Item 39.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

To ensure proper operation of the regenerative thermal oxidizers (RTOs) and on-going compliance with the 98 percent (%) destruction efficiency limit, the RTO temperature for THOX2 must not fall below 1548 degrees F on a 3-hour block average basis.

To demonstrate compliance with this limit, the facility owner or operator must continuously monitor RTO temperature and incorporate into a 3-hour block average. RTO temperature must be monitored using a continuous monitor that is installed, maintained, and calibrated in accordance with the manufacturer's recommendations.

If the RTO temperature falls below the limit above, the facility owner or operator must take immediate corrective action(s) to restore control equipment to its proper operating temperature. The facility owner or operator must record the reason and duration of any deviations from the limit above and any corrective actions taken.

The temperature monitoring limit is based on the RTO temperature measured during the latest approved destruction efficiency test. This limit may be changed based on the results of subsequent RTO destruction efficiency testing required elsewhere in this permit.

The facility must keep records of 3-hour block average temperatures, deviations, corrective actions, and any maintenance or calibration. These records must be kept for a period of at least five years and made available to the Department upon request.

Parameter Monitored: TEMPERATURE  
Lower Permit Limit: 1548 degrees Fahrenheit  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 3-HOUR BLOCK AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 40: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-5.4**

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Item 40.1:**

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

Emission Unit: A-00001

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

**Item 40.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emissions from any air contamination source project subject to 6 NYCRR Part 231 must meet the Lowest Achievable Emission Rate (LAER). Consistent with the LAER determination made at the time of initial permitting, VOC LAER for the printing presses, laminators, and corona treaters is 100 percent (%) capture using a Permanent Total Enclosure and 98% destruction efficiency using a regenerative thermal oxidizer (RTO).

To demonstrate compliance with this requirement, the facility owner or operator must conduct a performance test on each RTO to verify compliance with the destruction efficiency limit. The VOC destruction efficiency will be determined one of the following approved test methods: EPA Methods 18, 25, or 25A. In accordance with 6 NYCRR 202-1, a test protocol must be submitted to the Department at least 30 days prior to conducting the stack test. A stack test report must be submitted to the Department in triplicate within 60 days of completing the test.

The initial performance test for RTO THOX3 must be conducted within 180 days of startup. Initial testing of RTOs THOX1 and THOX2 was completed on 09/18/2018 and 11/04/2020, respectively and demonstrated compliance. Subsequent testing must be completed for each RTO once every five years or upon request by the Department.

Records of completed tests and test protocols must be maintained for a period of at least five years and made available to the Department upon request.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 98 percent reduction

Reference Test Method: EPA Methods 18, 25, or 25A

Monitoring Frequency: Once every five years

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 41: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-5.4**

**Item 41.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 41.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The emissions from any air contamination source project subject to 6 NYCRR Part 231 must meet the Lowest Achievable Emission Rate (LAER). Consistent with the LAER determination made at the time of initial permitting, VOC LAER for the flexowash plate washer is limiting VOC emissions from this emission source to 0.20 tons per year (tpy) on a 12-month rolling basis.

To demonstrate compliance with this emissions limit, the facility owner or operator must calculate 12-month rolling VOC emissions from the plate washer on a monthly basis. VOC emissions must be calculated based on material throughput data, the control efficiency of the regenerative thermal oxidizers determined during the latest performance test, other production records, and emissions factors, as appropriate.

A summary of the 12-month rolling VOC emissions from the plate washer must be included in the semi-annual certification report for the 70 tpy VOC facility emission limit required under 6 NYCRR 201-6.5 elsewhere in this permit.

Records of monthly calculations, material throughput, performance test reports, and other supporting information used to demonstrate compliance with this limit must be kept on-site for a period of at least five years. Records

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

must be made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 0.2 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 42: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-5.4**

**Item 42.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 42.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The emissions from any air contamination source project subject to 6 NYCRR Part 231 must meet the Lowest Achievable Emission Rate (LAER). Consistent with the LAER determination made at the time of initial permitting, VOC LAER for the plate processing distillation unit is limiting VOC emissions from this emission source to 0.3 tons per year (tpy) on a 12-month rolling basis.

To demonstrate compliance with this emissions limit, the facility owner or operator must calculate 12-month rolling VOC emissions from the plate processing distillation unit on a monthly basis. VOC emissions must be calculated based on material throughput data, the control efficiency of the regenerative thermal oxidizers determined during the latest performance test, other production records, and emissions factors, as appropriate.

A summary of the 12-month rolling VOC emissions from the plate processing distillation unit must be included in the semi-annual certification report for the 70 tpy VOC facility emission limit required under 6 NYCRR 201-6.5 elsewhere in this permit.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Records of monthly calculations, material throughput, performance test reports, and other supporting information used to demonstrate compliance with this limit must be kept on-site for a period of at least five years. Records must be made available to the Department upon request.

Parameter Monitored: VOC  
Upper Permit Limit: 0.30 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 43: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-5.4**

**Item 43.1:**

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

Emission Unit: A-00001

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

**Item 43.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The emissions from any air contamination source project subject to 6 NYCRR Part 231 must meet the Lowest Achievable Emission Rate (LAER). Consistent with the LAER determination made at the time of initial permitting, VOC emissions from the natural gas-fired emergency generator must not exceed 0.10 tons per year (tpy) on a 12-month rolling basis.

To demonstrate compliance with this requirement, the facility owner or operator must calculate VOC emissions from the emergency generator on a monthly basis and incorporate into a 12-month rolling total. Additionally, the emergency generator must be certified to meet 40 CFR 60, Subpart JJJJ emissions standards and meet all applicable requirements under 40 CFR 60, Subpart JJJJ as specified elsewhere in this permit.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Records of calculations, emergency generator operation hours, and generator certification must be kept on-site for a period of at least five years. Records must be made available to the Department upon request.

Parameter Monitored: VOC  
 Upper Permit Limit: 0.1 tons per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 44: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-5.4**

**Item 44.1:**

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

Emission Unit: A-00001

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

**Item 44.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The emissions from any air contamination source project subject to 6 NYCRR Part 231 must meet the Lowest Achievable Emission Rate (LAER). Consistent with the LAER determination made at the time of initial permitting, VOC emissions from three (3) underground storage tanks (USTs) must not exceed 0.05 tons per year (tpy) on a 12-month rolling basis.

To demonstrate compliance with this requirement, the facility owner or operator must calculate VOC emissions from the USTs on a monthly basis and incorporate into a 12-month rolling total. VOC emissions must be calculated based on actual monthly material throughput and an acceptable emissions calculation procedure.

Records of calculations and material throughput must be kept on-site for a period of at least five years. Records must be made available to the Department upon request.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Parameter Monitored: VOC

Upper Permit Limit: 0.05 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 45: Compliance Certification  
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 231-5.4****Item 45.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 45.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The emissions from any air contamination source project subject to 6 NYCRR Part 231 must meet the Lowest Achievable Emission Rate (LAER). Consistent with the LAER determination made at the time of initial permitting, VOC LAER for the spent solvent processing distillation unit is limiting VOC emissions from this emission source to 1 tons per year (tpy) on a 12-month rolling basis.

To demonstrate compliance with this emissions limit, the facility owner or operator must calculate 12-month rolling VOC emissions from the spent solvent processing distillation unit on a monthly basis. VOC emissions must be calculated based on material throughput data, the control efficiency of the regenerative thermal oxidizers determined during the latest performance test, other production records, and emissions factors, as appropriate.

A summary of the 12-month rolling VOC emissions from the spent solvent processing distillation unit must be included in the semi-annual certification report for the 70 tpy VOC facility emission limit required under 6 NYCRR 201-6.5 elsewhere in this permit.



Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Records of monthly calculations, material throughput, performance test reports, and other supporting information used to demonstrate compliance with this limit must be kept on-site for a period of at least five years. Records must be made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 1.0 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 46: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-5.4**

**Item 46.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 46.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The emissions from any air contamination source project subject to 6 NYCRR Part 231 must meet the Lowest Achievable Emission Rate (LAER). Consistent with the LAER determination made during Renewal 1 of the permit, VOC LAER for the flexowash sleeve washer is limiting VOC emissions from this emission source to 1.27 tons per year (tpy) on a 12-month rolling basis.

To demonstrate compliance with this emissions limit, the facility owner or operator must calculate 12-month rolling VOC emissions from the sleeve washer on a monthly basis. VOC emissions must be calculated based on material throughput data, the control efficiency of the regenerative thermal oxidizers determined during the latest performance test, other production records, and emissions factors, as appropriate.

A summary of the 12-month rolling VOC emissions from the

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

sleeve washer must be included in the semi-annual certification report for the 70 tpy VOC facility emission limit required under 6 NYCRR 201-6.5 elsewhere in this permit.

Records of monthly calculations, material throughput, performance test reports, and other supporting information used to demonstrate compliance with this limit must be kept on-site for a period of at least five years. Records must be made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 1.27 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 47: Compliance Certification**  
**Effective for entire length of Permit**

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

**Item 47.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001

Process: FXP

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 47.2:**

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

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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 1, 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.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 48: Compliance Certification  
 Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 234.5 (a)**

**Item 48.1:**

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

Emission Unit: A-00001  
 Process: FXP

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

**Item 48.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which a coating, ink or adhesive is to be applied to a substrate.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

This prohibition shall not apply to the following:

- (1) ink, coating, or adhesive used in printing processes where control equipment has been installed to demonstrate compliance with this Part; or
- (2) ink, coating, or adhesive used in printing processes that have been granted variances for reasons of technological and economic feasibility per section 234.3(f) of 6 NYCRR Part 234 .

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 49: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 234.6**

**Item 49.1:**

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

Emission Unit: A-00001  
 Process: FXP

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

**Item 49.2:**

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,

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

coating or adhesive to a substrate.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 50: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 234.7**

**Item 50.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001

Process: FXP

**Item 50.2:**

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 51: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 234.8**

**Item 51.1:**

The Compliance Certification activity will be performed for the facility:

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

The Compliance Certification applies to:

Emission Unit: A-00001 Process: FXP	Emission Point: EP002
Emission Unit: A-00001 Process: FXP	Emission Point: EP003
Emission Unit: A-00001 Process: FXP	Emission Point: EP006
Emission Unit: A-00001 Process: FXP	Emission Point: EP007
Emission Unit: A-00001 Process: FXP	Emission Point: EP009

**Item 51.2:**

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 10 percent or greater from any graphic arts emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of an EPA Reference Method 9 opacity evaluation at any time during facility operation.

The facility owner or operator shall conduct a visible emissions observation of all emission points specified by this condition once per day while the process is in operation. The facility owner or operator will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard specified below.

The facility owner or operator 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 limit specified (except the emission of uncombined water) are observed for three consecutive operating days from the same emission point, the facility owner or operator will notify the Department of the observations within one business day. The facility owner or operator will also perform an EPA Reference Test Method 9 opacity evaluation analysis of the affected emission point and submit the results to the Department.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Daily records of the visible emissions observations, any follow-up Method 9 observations, investigations, and corrective actions taken are to be maintained on site for a period of at least five years from the date of the record. Such records shall include the date and time of each observation, weather conditions, results of the observation, corrective actions taken, and explanations for days when weather conditions were prohibitive. All records kept pursuant to this condition must be provided to the Department upon request.

Parameter Monitored: OPACITY  
 Upper Permit Limit: 10 percent  
 Reference Test Method: EPA Method 9  
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 52: Applicability**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 60, NSPS Subpart JJJJ**

**Item 52.1:**  
 Facilities that have stationary spark ignition internal combustion engines must comply with applicable portions of 40 CFR 60 subpart JJJJ.

**Condition 53: Applicability**  
**Effective for entire length of Permit**

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

**Item 53.1:**  
 Facilities that have reciprocating internal combustion engines must comply with applicable portions of 40 CFR 63 subpart ZZZZ.

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

**Condition 54: Emission Point Definition By Emission Unit**  
**Effective for entire length of Permit**

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

**Item 54.1:**

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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

Emission Unit: A-00001			
Emission Point: EP001			
Height (ft.): 40	Diameter (in.): 64		
NYTMN (km.): 4775.379	NYTME (km.): 277.156	Building: MAIN	
Emission Point: EP002			
Height (ft.): 35	Length (in.): 32	Width (in.): 32	
NYTMN (km.): 4775.379	NYTME (km.): 277.156	Building: MAIN	
Emission Point: EP003			
Height (ft.): 35	Length (in.): 32	Width (in.): 32	
NYTMN (km.): 4775.379	NYTME (km.): 277.156	Building: MAIN	
Emission Point: EP004			
Height (ft.): 35	Length (in.): 32	Width (in.): 32	
NYTMN (km.): 4775.379	NYTME (km.): 277.156	Building: MAIN	
Emission Point: EP005			
Height (ft.): 35	Length (in.): 32	Width (in.): 32	
NYTMN (km.): 4775.379	NYTME (km.): 277.156	Building: MAIN	
Emission Point: EP006			
Height (ft.): 40	Diameter (in.): 64		
NYTMN (km.): 4775.292	NYTME (km.): 276.576	Building: MAIN	
Emission Point: EP007			
Height (ft.): 35	Length (in.): 32	Width (in.): 32	
NYTMN (km.): 4775.292	NYTME (km.): 276.576	Building: MAIN	
Emission Point: EP008			
Height (ft.): 35	Length (in.): 32	Width (in.): 32	
NYTMN (km.): 4775.292	NYTME (km.): 276.576	Building: MAIN	
Emission Point: EP009			
Height (ft.): 40	Diameter (in.): 64		
NYTMN (km.): 4775.379	NYTME (km.): 277.156	Building: MAIN	
Emission Point: EP010			
Height (ft.): 35	Length (in.): 32	Width (in.): 32	
NYTMN (km.): 4775.379	NYTME (km.): 277.156	Building: MAIN	

**Condition 55: Process Definition By Emission Unit  
Effective for entire length of Permit**

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

**Item 55.1:**

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



Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Emission Unit: A-00001

Process: AL1

Source Classification Code: 4-02-007-01

Process Description:

Adhesive Laminator and drying processes that use solvent and water based adhesives. This process is subject to LAER and VOC emissions must meet 100 percent (%) capture efficiency Permanent Total Enclosure and 98% destruction efficiency using a Permanent Total Enclosure and one of three regenerative thermal oxidizers, respectively. Emergency bypass stack EP004 will be used in the event of an emergency shut down.

Emission Source/Control: ENC04 - Control

Control Type: PROCESS ENCLOSED (ENCLOSURE)

Emission Source/Control: ENC08 - Control

Control Type: PROCESS ENCLOSED (ENCLOSURE)

Emission Source/Control: THOX1 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: THOX2 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: THOX3 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: ALDP1 - Process

Emission Source/Control: ALP-2 - Process

Emission Source/Control: LDRY1 - Process

Design Capacity: 2.2 million Btu per hour

**Item 55.2:**

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

Emission Unit: A-00001

Process: CT1

Source Classification Code: 4-02-045-31

Process Description:

Coater 1 and drying process with solvent and water based coatings. VOC emissions are controlled using one of three regenerative thermal oxidizers. Emergency bypass stack EP008 may be used in the event of an emergency shutdown.

Emission Source/Control: ENC08 - Control

Control Type: PROCESS ENCLOSED (ENCLOSURE)

Emission Source/Control: THOX1 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: THOX2 - Control

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Control Type: THERMAL OXIDATION

Emission Source/Control: THOX3 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: COAT1 - Process

**Item 55.3:**

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

Emission Unit: A-00001

Process: EX1

Source Classification Code: 4-02-013-01

Process Description:

Paper and plastic film are coated using solvent based extruder primers and melted/extruded polyethylene resins. VOC emissions from the process are controlled using a 100 percent (%) capture efficiency Permanent Total Enclosure and 98% minimum destruction efficiency from one of three regenerative thermal oxidizers. Emergency bypass stack EP005 will be used in the event of an emergency shut down.

Emission Source/Control: ENC05 - Control  
Control Type: PROCESS ENCLOSED (ENCLOSURE)

Emission Source/Control: THOX1 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: THOX2 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: THOX3 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: SCEXT - Process

**Item 55.4:**

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

Emission Unit: A-00001

Process: EX2

Source Classification Code: 4-02-013-01

Process Description:

Paper and plastic film are coated using solvent based extruder primers and melted/extruded polyethylene resins. VOC emissions from the process are controlled using a 100 percent (%) capture efficiency Permanent Total Enclosure and 98% minimum destruction efficiency from one of three regenerative thermal oxidizers. Emergency bypass stack EP010 will be used in the event of an emergency shut down.

Emission Source/Control: ENC10 - Control

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Control Type: PROCESS ENCLOSED (ENCLOSURE)

Emission Source/Control: THOX1 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: THOX2 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: THOX3 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: SCEX2 - Process

**Item 55.5:**

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

Emission Unit: A-00001

Process: EX3

Source Classification Code: 4-02-013-01

Process Description:

Paper and plastic film are coated using solvent based extruder primers and melted/extruded polyethylene resins. VOC emissions from the process are controlled using a 100 percent (%) capture efficiency Permanent Total Enclosure and 98% minimum destruction efficiency from one of three regenerative thermal oxidizers. Emergency bypass stack EP010 will be used in the event of an emergency shut down.

Emission Source/Control: ENC10 - Control  
Control Type: PROCESS ENCLOSED (ENCLOSURE)

Emission Source/Control: THOX1 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: THOX2 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: THOX3 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: SCEX3 - Process

**Item 55.6:**

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

Emission Unit: A-00001

Process: FXP

Source Classification Code: 4-05-003-01

Process Description:

Flexographic printing and drying using solvent and water based inks. This process is subject to LAER and VOC emissions must meet 100 percent (%) capture efficiency Permanent Total Enclosure and 98% destruction efficiency

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

using a Permanent Total Enclosure and one of three regenerative thermal oxidizers, respectively. In the event of an emergency shut-down, printing lines FLX1, FLX2, and FLX3 may utilize emergency bypass stacks EP002, EP003, and EP007, respectively.

Emission Source/Control: ENC02 - Control  
Control Type: PROCESS ENCLOSED (ENCLOSURE)

Emission Source/Control: ENC03 - Control  
Control Type: PROCESS ENCLOSED (ENCLOSURE)

Emission Source/Control: ENC07 - Control  
Control Type: PROCESS ENCLOSED (ENCLOSURE)

Emission Source/Control: THOX1 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: THOX2 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: THOX3 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: FLX-1 - Process

Emission Source/Control: FLX-2 - Process

Emission Source/Control: FLX-3 - Process

**Item 55.7:**

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

Emission Unit: A-00001  
Process: OZ1  
Source Classification Code: 4-02-999-97

Process Description:

Corona Treatment. Paper and film are treated with high voltage electricity in the ozone treaters. Treaters are located on printing, laminating, extrusion coating and coating lines.

Emission Source/Control: THOX1 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: THOX2 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: THOX3 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: CT-01 - Process

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Emission Source/Control: CT-02 - Process

Emission Source/Control: CT-03 - Process

Emission Source/Control: CT-04 - Process

Emission Source/Control: CT-05 - Process

Emission Source/Control: CT-06 - Process

Emission Source/Control: CT-07 - Process

Emission Source/Control: CT-08 - Process

Emission Source/Control: CT-09 - Process

Emission Source/Control: CT-10 - Process

Emission Source/Control: CT-11 - Process

Emission Source/Control: CT-12 - Process

Emission Source/Control: CT-13 - Process

Emission Source/Control: CT-14 - Process

**Condition 56: Compliance Certification**  
**Effective for entire length of Permit**

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

**Item 56.1:**

The Compliance Certification activity will be performed for:

Emission Unit: A-00001

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 56.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

semi-annually. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site and a summary will be included in the semi-annual monitoring reports. 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: PARTICULATES  
Upper Permit Limit: 0.05 grains per dscf  
Reference Test Method: EPA RM 5  
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.  
Subsequent reports are due every 6 calendar month(s).

**Condition 57: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)**

**Item 57.1:**

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

Emission Unit: A-00001

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Process: AL1

Emission Unit: A-00001  
Process: CT1

Emission Unit: A-00001  
Process: EX1

Emission Unit: A-00001  
Process: EX2

Emission Unit: A-00001  
Process: EX3

**Item 57.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Condition 58: Compliance Certification**  
**Effective for entire length of Permit**

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

**Item 58.1:**

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

Emission Unit: A-00001  
Process: AL1

Emission Unit: A-00001  
Process: CT1

Emission Unit: A-00001  
Process: EX1

Emission Unit: A-00001  
Process: EX2

Emission Unit: A-00001  
Process: EX3

**Item 58.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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.

Reference Test Method: EPA Reference Test Method 311 or 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 59: Overall Removal Efficiency**  
**Effective for entire length of Permit**



Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Applicable Federal Requirement: 6 NYCRR 228-1.6 (d)****Item 59.1:**

This Condition applies to:

Emission Unit: A00001  
Process: AL1Emission Unit: A00001  
Process: CT1Emission Unit: A00001  
Process: EX1Emission Unit: A00001  
Process: EX2Emission Unit: A00001  
Process: EX3**Item 59.1:**

This Condition applies to Emission Unit: A-00001

**Item 59.2.3:**

When an owner and/or operator of a coating line utilizes control equipment to comply with permit requirements or regulations, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

- (1) The overall removal efficiency may be made by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment.
- (2) For any control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment. The approved VOC CE test methods are contained Part 228-1.6(d)(2) Table 'Approved VOC CE Test Methods'. Test methods 204 through 204F (M204 - M204F) are included in Appendix M of 40 CFR part 51 (see table 1, Section 200.9 of this Title). When the sampling and analysis methods by this paragraph are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.
- (3) Alternative CE protocols and test methods may be allowed if the data quality objective approach or lower confidence limit approach requirements are met in conjunction with the additional criteria set forth in the EPA guidance document entitled Guidelines for Determining Capture Efficiency (see table 1, Section 200.9 of Title III). The alternative CE protocols and test methods must be approved in advance by the department. Also, the multiple line testing procedures outlined in the above guidance document can be used to determine CE if the applicable criteria are satisfied. The multiple line testing CE protocols and test methods must be approved in advance by the department.

**Condition 60: VOC content of gas stream test methods**

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Effective for entire length of Permit**

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

**Item 60.1:**

This Condition applies to:

Emission Unit: A00001  
Process: AL1

Emission Unit: A00001  
Process: CT1

Emission Unit: A00001  
Process: EX1

Emission Unit: A00001  
Process: EX2

Emission Unit: A00001  
Process: EX3

**Item 60.1:**

This Condition applies to Emission Unit: A-00001

**Item 60.2.3:**

The owner and/or operator of a surface coating line must follow the applicable notification requirements, protocol requirements, and test procedures of 6 NYCRR Part 202 for testing and monitoring. Depending on the conditions at the test site, one of the following methods from Appendix A of 40 CFR Part 60 (see Table 1 of 6 NYCRR Part 200.9) must be used when measuring the VOC content of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

- (1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;
- (2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or
- (3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

When the sampling and analysis methods required by this condition are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department.

**Condition 61: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.4 (d)**

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Item 61.1:**

The Compliance Certification activity will be performed for:

Emission Unit: A-00001

Process: AL1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 61.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Work practices shall be employed at facilities where the total actual VOC emissions from all industrial adhesive application processes, including related cleaning activities, equal or exceed three tons in a 12-month rolling period, before consideration of emission control equipment. Work practices shall include:

(1) the following types of application equipment, with the use of low-VOC adhesives or adhesive primers: electrostatic spray; HVLP spray; flow coat; roll coat or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application; dip coat (including electrodeposition); airless spray; air-assisted airless spray; any other adhesive application method, subject to Department approval, capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spraying;

(2) the following work practices for storage, mixing operations, and handling operations for adhesives, thinners, and adhesive-related waste materials that:

(i) store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers;

(ii) ensure that mixing and storage containers used for VOC-containing adhesives, adhesive primers, and process related waste materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing adhesives, adhesive primers, and process related waste materials; and

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

(iv) convey VOC-containing adhesives, adhesive primers, and process related waste materials from one location to another in closed containers or pipes.

(3) the following work practices to reduce VOC emissions from cleaning materials used in industrial adhesive application processes that:

(i) store all VOC-containing cleaning materials and used shop towels in closed containers;

(ii) ensure that storage containers used for VOC-containing materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing cleaning materials;

(iv) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

(v) minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 62: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.5 (b)**

**Item 62.1:**

The Compliance Certification activity will be performed for:

Emission Unit: A-00001

Process: AL1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 62.2:**

Compliance Certification shall include the following monitoring:

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities that comply with the VOC content limits in 6 NYCRR Part 228-2.4(a) through the use of add-on air pollution control equipment shall record the key operating parameters for the control equipment, including but not limited to, the following information:

(1) the volume used per day of each adhesive, sealant, adhesive primer, sealant primer or solvent listed in Table 1 of 6 NYCRR Part 228-2.4(a);

(2) on a daily basis, the combustion temperature, inlet and exhaust gas temperatures and control device efficiency, as appropriate, pursuant to 6 NYCRR Part 228-2.4(c);

(3) daily hours of operation; and

(4) all maintenance performed including the date and type of maintenance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 63: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.5 (c)**

**Item 63.1:**

The Compliance Certification activity will be performed for:

Emission Unit: A-00001

Process: AL1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 63.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records made to determine compliance with Subpart 228-2 shall be maintained for five years from the date such record is created and shall be made available to the Department within 90 days of a request.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 64: Compliance Procedures and Test Methods for Air Pollution  
Control Equipment  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-2.6 (g)**

**Item 64.1:**

This Condition applies to Emission Unit: A-00001  
Process: AL1

**Item 64.2:**

If a Facility uses air pollution control equipment to meet the requirements of 6 NYCRR Part 228-2, the following determinations shall be made:

(1) the measurement of capture efficiency shall be conducted and reported in accordance with the EPA Technical Document Guidelines for Determining Capture Efficiency, issued January 9, 1995; and

(2) the control efficiency shall be determined in accordance with U.S. EPA Reference Methods 25, 25A, and 25B found at 40 CFR part 60 appendix A, and CARB Method 100.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**STATE ONLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

(2) the equipment at the facility was being properly operated and maintained;

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

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

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

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

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

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

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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 65: Contaminant List**  
**Effective for entire length of Permit**

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

**Item 65.1:**

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

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

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

**Condition 66: Malfunctions and Start-up/Shutdown Activities**  
**Effective for entire length of Permit**

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

**Item 66.1:**

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

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



Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

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

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

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

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

**Condition 67: CLCPA Applicability**  
**Effective for entire length of Permit**

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

**Item 67.1:**

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

**Condition 68: Air pollution prohibited**  
**Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR 211.1**

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202

**Item 68.1:**

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.

Permit ID: 8-2622-00202/00001

Facility DEC ID: 8262200202