



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 9-1430-00110/00021  
Mod 0 Effective Date: 05/14/2013 Expiration Date: 05/13/2018  
Mod 1 Effective Date: 02/06/2014 Expiration Date: 05/13/2018  
Mod 2 Effective Date: 05/18/2015 Expiration Date: 05/13/2018

Permit Issued To: TRINITY PACKAGING CORPORATION  
90 INDUSTRIAL AVE  
ROCKY MOUNT, VA 24151

Contact: JIM GRABOSKI  
TRINITY PACKAGING CORP  
90 INDUSTRIAL AVE  
ROCKY MOUNT, VA 24151  
(540) 489-9915

Facility: TRINITY PACKAGING CORP  
55 INNSBRUCK DR  
CHEEKTOWAGA, NY 14227

Contact: TIM SHILEY  
55 INNSBRUCK DR  
BUFFALO, NY 14227  
(716) 668-7229

Description:  
Trinity Packaging Corporation (Trinity) is a commercial flexographic printing facility located in the Town of Cheektowaga, Erie County, New York. Trinity designs, prints, and converts flexible packaging materials used in food, medical, industrial, and personal care/hygiene consumer products. The facility operates and maintains flexographic printing presses used to print packaging products on various substrates including polyethylene, polypropylene, cellophane, nylon, and polyester.

Trinity is subject to the Title V permitting requirements stated in 6NYCRR Part 201-6 for major facilities. This minor permit modification adds several emission sources associated with a new solventless laminator. The new emission sources are four corona discharge surface treaters and one ozone decomposer which vents to a new emission point. The minor modification also removes references to the catalytic oxidizer which was permanently



taken out of service in 2014 upon the installation and use of the regenerative thermal oxidizer (RTO) as the primary control equipment for the flexographic presses. Also, the name of the facility has been changed to Trinity Packaging Corporation from Cello-Pack Corporaton due to a ownership change. Company name references within the permit have been updated.

The facility now has a total of ten corona discharge surface treaters which cumulatively have a potential-to-emit ozone of 320 pounds per year and are expected to actually emit 219 pounds of ozone per year. The ozone is treated in either the ozone decomposer of the RTO.

The facility is organized into one emission unit identified as 1-PRESS. Emission unit 1-PRESS consists of four wide-web flexographic printing presses, ten corona discharge surface treaters, one combo laminator, and five dryers. Trinity operates a RTO to reduce and control the VOC emissions from the flexographic printing presses and the combo laminator when it is utilizing solvent-based adhesives. The laminator can utilize solvent-less, water-based, and/or solvent-based adhesives and is subject to 6 NYCRR Part 228-2 requirements for volatile organic compound (VOC) control.

The facility will limit potential VOC emissions from Presses 9 & 10 to less than 39 tpy for each press, which is less than the VOC project emission potential applicability threshold of 40 tpy per 6NYCRR Part 231-13 New Source Review.

Trinity currently operates three flexographic presses identified as presses 7, 8 and 9 which were installed in 2000, 2001 and 2006, respectively, and are controlled by a common catalytic oxidizer. The presses have been subject to 75% capture and control per 6 NYCRR Part 234.3(a)(1)(ii)(d), but upon installation of the RTO will be subject to 234.3(a)(1)(ii)(e) which has been modified effective July 8, 2010 to require 80 percent capture and control for volatile organic compounds (VOC) emissions. The facility has documented 100% capture via permanent total enclosure testing for each individual press. Trinity conducted performance testing of the RTO on September 3, 2014 which documented an actual destruction efficiency of 99.7%.

The facility's previous TV permit also contained VOC emission limits for Presses 7, 8, & 9 to limit their actual VOC emissions to less than the 40 ton per year, the project emission potential threshold in 6NYCRR Part 231-2, New Source Review (NSR) for New and Modified Facilities. The current version of



Part 231 became effective on October 15, 2011 and retained the VOC project emission potential applicability threshold of 40 tons per year. These emission limits were necessary at the time of initial permit issuance since the past overall removal efficiency required by Part 234 was only 60%, and then 75% (effective July 8, 2010) upon permit renewal number 2 when it was issued on May 14, 2013. Neither of the overall removal efficiencies were enough to limit the potential-to-emit (PTE) of the individual presses to less than the 40 tpy project emission potential. With the current 80% overall removal efficiency requirement the PTEs for presses 7 and 8 are less than 40 tpy, however, and the ton per year emission limits have been removed from the permit. The “cap” for press 9 will remain because the PTE after 80% control is greater than 40 tons per year.

In 2014, Trinity replaced a catalytic oxidizer with a larger regenerative thermal oxidation unit and add a fourth flexographic press, press #10. This press is also subject to NSR review and, based on its PTE, must limit VOC emissions to less than 40 tons per year. The capping requirement uses the capture and control efficiency from stack testing to calculate the VOC emissions on a 12 month rolling total to determine compliance with the individual 40 ton caps for presses 9 and 10 as stated in the attached permit or stated elsewhere in this permit.

Trinity is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), since the facility has potential pre-control device VOC emissions greater than 50 tons per year, which is the major source threshold level, and a control device is used to achieve compliance with an emission standard. This rule required Trinity to submit a CAM Plan which detailed and justified the monitoring indicators and performance criteria used at the facility to assure proper operation of the control device.

The VOC emissions from the printing operations are subject to the Reasonably Available Control Technology (RACT) provisions specified in 6NYCRR Part 234. In accordance with 6NYCRR Part 234, Trinity is required to operate the flexographic printing process such that the capture system and the air cleaning devices provide for an overall reduction in VOC emissions of at least 80%, but in some cases up to a minimum of 83.5% reduction based on the particular press and oxidizer. Trinity is required to conduct performance testing of the presses (to determine capture efficiency) and the oxidizer (to determine destruction efficiency) once every permit term to assure compliance with the overall VOC reduction requirements.

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 9143000110**



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:           LISA M CZECHOWICZ  
  NYSDEC - REGION 9  
  270 MICHIGAN AVE  
  BUFFALO, NY 14203-2915

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



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



**DEC GENERAL CONDITIONS**

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

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

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

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

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

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

**Item 3.3:**

Permits are transferrable with the approval of the department unless specifically prohibited by



the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 4: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

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

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

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

**Condition 5: Submission of application for permit modification or renewal-REGION 9 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 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2915  
(716) 851-7165



**New York State Department of Environmental Conservation**

Permit ID: 9-1430-00110/00021

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

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

**IDENTIFICATION INFORMATION**

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90 INDUSTRIAL AVE  
ROCKY MOUNT, VA 24151

Facility: TRINITY PACKAGING CORP  
55 INNSBRUCK DR  
CHEEKTOWAGA, NY 14227

Authorized Activity By Standard Industrial Classification Code:  
2741 - MISCELLANEOUS PUBLISHING  
2396 - AUTOMOTIVE & APPAREL TRIMMINGS

Mod 0 Permit Effective Date: 05/14/2013

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Permit Expiration Date: 05/13/2018

Mod 2 Permit Effective Date: 05/18/2015

Permit Expiration Date: 05/13/2018



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 1-1 6 NYCRR 201-6.4 (a) (7): Fees
- 1-2 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 1-3 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 2-1 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 2-2 6 NYCRR 201-6.4 (e): Compliance Certification
- 6 6 NYCRR 202-2.1: Compliance Certification
- 7 6 NYCRR 202-2.5: Recordkeeping requirements
- 8 6 NYCRR 215.2: Open Fires - Prohibitions
- 9 6 NYCRR 200.7: Maintenance of Equipment
- 1-6 6 NYCRR 201-1.7: Recycling and Salvage
- 10 6 NYCRR 201-1.7: Recycling and Salvage
- 11 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 1-7 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 12 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 1-8 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 13 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 1-9 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 1-10 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 1-11 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR 200.3: False statement
- 22 6 NYCRR Subpart 201-6: Emission Unit Definition
- 1-12 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 1-13 6 NYCRR 201-7.1: Facility Permissible Emissions
- \*2-3 6 NYCRR 201-7.1: Capping Monitoring Condition
- 29 6 NYCRR 211.1: Air pollution prohibited
- 2-4 6 NYCRR 228-2.4 (c): Compliance Certification
- 2-5 6 NYCRR 234.3 (a) (1) (ii) ('e'): Compliance Certification
- 2-6 6 NYCRR 234.3 (a) (1) (ii) ('e'): Compliance Certification
- 2-7 6 NYCRR 234.4 (a): Compliance Certification
- 2-8 6 NYCRR 234.4 (a): Compliance Certification
- 30 40CFR 63.820(a)(2), Subpart KK: Compliance Certification
- 31 40CFR 63.829(d), Subpart KK: Compliance Certification
- 2-9 40 CFR Part 64: Compliance Certification

#### Emission Unit Level

- 33 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 34 6 NYCRR Subpart 201-6: Process Definition By Emission Unit
- 2-10 6 NYCRR 228-2.4 (d): Compliance Certification
- 2-11 6 NYCRR 228-2.5 (b): Compliance Certification



**EU=1-PRESS**

- 2-12 6 NYCRR 228-2.6 (g): Compliance Procedures and Test Methods for Air Pollution Control Equipment
- 36 6 NYCRR 234.1 (c): Once in, always in
- 1-24 6 NYCRR 234.5: Compliance Certification
- 44 6 NYCRR 234.6: Compliance Certification
- 2-13 6 NYCRR 234.7: Compliance Certification
- 46 6 NYCRR 234.7: Compliance Certification
- 47 6 NYCRR 234.8: Compliance Certification

**EU=1-PRESS,Proc=001,ES=RTO01**

- 2-14 6 NYCRR 234.4 (c): Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 50 ECL 19-0301: Contaminant List
- 51 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 52 6 NYCRR 201-1.4: Unavoidable noncompliance and violations

NOTE: \* preceding the condition number indicates capping.



**FEDERALLY ENFORCEABLE CONDITIONS**  
**\*\*\*\* Facility Level \*\*\*\***

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

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

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

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

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

**Item C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)**

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

**Item D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)**

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

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

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and



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

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

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

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

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

**Item H: Severability - 6 NYCRR 201-6.4 (a) (9)**

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

**Item I: Permit Shield - 6 NYCRR 201-6.4 (g)**

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

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V



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

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

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

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

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the department pursuant to the provisions of section 201- 6.6 of this Subpart.

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

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

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

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



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

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

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

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

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

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

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

**Condition 1: Acceptable Ambient Air Quality  
Effective between the dates of 05/14/2013 and 05/13/2018**

**Applicable Federal Requirement: 6 NYCRR 200.6**

**Item 1.1:**

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

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

**Condition 1-1: Fees**

**Effective between the dates of 02/06/2014 and 05/13/2018**

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

**Item 1-1.1:**

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 1-2: Recordkeeping and Reporting of Compliance Monitoring**

**Effective between the dates of 02/06/2014 and 05/13/2018**

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

**Item 1-2.1:**

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 1-3: Records of Monitoring, Sampling, and Measurement**

**Effective between the dates of 02/06/2014 and 05/13/2018**

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

**Item 1-3.1:**

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





reports required by the permit.

**Condition 2-1: Compliance Certification**  
**Effective between the dates of 05/18/2015 and 05/13/2018**

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

**Item 2-1.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 2-1.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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



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

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

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

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

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

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 2-2: Compliance Certification**  
**Effective between the dates of 05/18/2015 and 05/13/2018**

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

**Item 2-2.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 2-2.2:**

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;

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- such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

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

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

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

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

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
NYSDEC Region 9 Headquarters  
270 Michigan Avenue  
Buffalo, NY 14203-2915

The address for the BQA is as follows:

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

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2014.  
Subsequent reports are due on the same day each year

**Condition 6: Compliance Certification**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**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:

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

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

**Condition 7: Recordkeeping requirements**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 7.1:**

(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 8: Open Fires - Prohibitions**  
**Effective between the dates of 05/14/2013 and 05/13/2018**



**Applicable Federal Requirement:6 NYCRR 215.2**

**Item 8.1:**

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 8.2**

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

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

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



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

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

**Condition 9: Maintenance of Equipment**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 9.1:**

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 1-6: Recycling and Salvage**  
**Effective between the dates of 02/06/2014 and 05/13/2018**

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

**Item 1-6.1:**

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 10: Recycling and Salvage**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 10.1:**

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 11: Prohibition of Reintroduction of Collected Contaminants to the air**

**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 11.1:**

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 1-7: Exempt Sources - Proof of Eligibility**  
**Effective between the dates of 02/06/2014 and 05/13/2018**



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

**Item 1-7.1:**

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

**Condition 12: Exempt Sources - Proof of Eligibility**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 12.1:**

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source 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 which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

**Condition 1-8: Trivial Sources - Proof of Eligibility**  
**Effective between the dates of 02/06/2014 and 05/13/2018**

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

**Item 1-8.1:**

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 13: Trivial Sources - Proof of Eligibility**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 13.1:**

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source 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 which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.





**Condition 1-9: Requirement to Provide Information**  
**Effective between the dates of 02/06/2014 and 05/13/2018**

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

**Item 1-9.1:**

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 1-10: Right to Inspect**  
**Effective between the dates of 02/06/2014 and 05/13/2018**

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

**Item 1-10.1:**

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

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

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

**Condition 1-11: Off Permit Changes**  
**Effective between the dates of 02/06/2014 and 05/13/2018**

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

**Item 1-11.1:**

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit

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(whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

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

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

**Condition 18: Required Emissions Tests**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 18.1:**

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

**Condition 19: Accidental release provisions.**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 19.1:**

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

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
  - 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

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**Condition 20: Recycling and Emissions Reduction**  
Effective between the dates of 05/14/2013 and 05/13/2018

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

**Item 20.1:**

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

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

**Condition 21: False statement**  
Effective between the dates of 05/14/2013 and 05/13/2018

**Applicable Federal Requirement:6 NYCRR 200.3**

**Item 21.1:**

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

**Condition 22: Emission Unit Definition**  
Effective between the dates of 05/14/2013 and 05/13/2018

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

**Item 22.1(From Mod 2):**

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

Emission Unit: 1-PRESS

Emission Unit Description:

Emission Unit 1-PRESS consists of four flexographic printing presses (00P07, 00P08, 00P09 and 00P10), one solvent-based laminator (00L01), ten corona discharge surface treaters (CDST4, CDST5, CDST7, CDST8, CDST9, CDT10, CDT11, CDT12, CDT13, and CDT14) and five dryers (DRY07, DRY08, DRY09, DRY10 and DRY11). CDST4 and CDST5 are associated with a solventless laminator, CDST7 and DRY07 are associated with emission source 00P07. CDST8 and DRY08 are associated with emission source 00P08. CDST9 and DRY09 is associated with emission source 00P09. CDT10 and DRY10 are associated with emission source 00P10. CDT11, CDT12 and DRY11 are associated with 00L01. CDT13 and CDT14 are associated with a new solventless laminator. VOC emissions from the four flexographic presses and the combo laminator when it runs solvent-based chemicals are routed to the regenerative thermal oxidizer (RT001) and vented through EP 02000. Ozone emissions from CDST9, CDT13 and CDT14 are routed through an ozone decomposer (COD04) and vented through EP 00610. Ozone emissions from the

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remaining seven corona discharge surface treaters are routed through RTO01 and vented through EP 02000. When the combo laminator and the two solventless laminators run solventless or water-based adhesives, they exhaust directly to atmosphere.

Building(s): MAIN

**Condition 1-12: Progress Reports Due Semiannually**  
**Effective between the dates of 02/06/2014 and 05/13/2018**

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

**Item 1-12.1:**

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

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Condition 1-13: Facility Permissible Emissions**  
**Effective between the dates of 02/06/2014 and 05/13/2018**

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 2-13.1:**

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0 (From Mod 2) PTE: 156,000 pounds  
per year  
Name: VOC

**Condition 2-3: Capping Monitoring Condition**  
**Effective between the dates of 05/18/2015 and 05/13/2018**

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 2-3.1:**

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

6 NYCRR Subpart 231-6

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**Item 2-3.2:**

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

**Item 2-3.3:**

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

**Item 2-3.4:**

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

**Item 2-3.5:**

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

**Item 2-3.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 2-3.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Trinity Packaging Corporation (Trinity) will limit volatile organic compounds (VOC) emissions from Press 9 and Press 10 to less than 39 tons per year (tpy) each for purposes of capping out of the source project requirements of 6NYCRR Part 231-6 New Source Review.

The actual VOC emissions shall be calculated based on the usage of ink, varnish, adhesive, solvent, and other VOC containing products; the VOC content of the products; and an overall VOC capture and destruction efficiency as determined by actual source testing. The general accuracy of the emission calculations shall be verified by maintaining pertinent records including, but not limited to: purchase and/or production records, VOC content of

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products, and hours of operation. All records with corresponding emission calculations shall be kept on-site for a minimum of five years. This information shall be made available to the Department on request.

Trinity will not exceed an emission rate of 39 tons of VOCs per rolling 12 month period for Press 9 or for Press 10. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formulae:

$$\text{VOC(Press 9)} = [\text{VOC}(00\text{P}09) \times (1-\text{CDE})]$$

$$\text{VOC(Press 10)} = [\text{VOC}(00\text{P}10) \times (1-\text{CDE})]$$

where,

$\text{VOC}(00\text{P}09)$  = VOC emissions generated by Press 9, designated emission source 00P09.

$\text{VOC}(00\text{P}10)$  = VOC emissions generated by Press 10, designated emission source 00P10.

CDE = overall capture and destruction efficiency of oxidizer system (designated emission source/control device RTO01) as measured during the most recent performance testing.

The facility shall submit to the Department an annual emission cap report for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each rolling 12-month period throughout the calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 39 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 29: Air pollution prohibited**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 29.1:**



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or catalytic oxidizer is operated; and

(5) operation records sufficient to demonstrate compliance with the requirements of this condition and are maintained as required by 6 NYCRR Part 228-2.5.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 2-5: Compliance Certification**  
**Effective between the dates of 05/18/2015 and 05/13/2018**

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

**Item 2-5.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-PRESS

Process: 001

Emission Source: 00P09

Emission Unit: 1-PRESS

Process: 001

Emission Source: 00P10

Emission Unit: 1-PRESS

Process: 001

Emission Source: RTO01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 2-5.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This condition applies to Presses 9 & 10 when emissions are routed to the regenerative thermal oxidizer, RTO01.

As specified in 6NYCRR Part 234.3(a)(1)(ii)(e), where a flexographic printing process is employed, the capture system and the air cleaning device must provide for an overall reduction in volatile organic compound (VOC) emissions of at least 80 percent for a printing process that was first installed on or after March 14, 1995, and that is controlled by an add-on capture system and air cleaning equipment that was first installed after July 8,





2010. The overall removal efficiency consists of two components and is calculated as the product of the capture efficiency of the gas collection system and the destruction efficiency of the control equipment.

The individual VOC potential-to-emit (PTE) of Presses 9 & 10 is greater than the VOC project emission potential applicability threshold per 6NYCRR Part 231-13 New Source Review which is 40 tons per year (tpy) when using the regenerative thermal oxidizer RTO01. Since an overall reduction in VOC emissions of 80% from either Press 9 or Press 10 does not limit the project emission potential to less than 40 tpy, a greater overall VOC removal efficiency is required.

To control the potential VOC emissions to less than 40 tpy, the overall VOC removal efficiency for RTO01 must be at least 83.5%. This minimum destruction efficiency is based on the maximum VOC usage of 239.1 tpy for either Press 9 or Press 10 from information stated in the permit modification application dated July 22, 2013 and in information submitted by Trinity on November 25, 2013.

The facility has documented 100% capture via permanent total enclosure testing for Press 9, and is required to perform the testing to verify the permanent total enclosure status of Press 10 within 180 days of Press 10 start-up. Trinity is also required to determine the destruction efficiency of RTO01 via reference method performance testing within 180 days of oxidizer start-up.

Initial compliance with this requirement will be demonstrated during performance testing as detailed elsewhere in this permit in a condition per 6NYCRR Part 234.4(a). Continuous compliance with the 83% overall removal efficiency will be assured by: (1) maintaining and operating the capture system as initially designed by the manufacturer, and (2) maintaining the destruction efficiency of the catalytic oxidizer as outlined elsewhere in this permit in a condition per 6NYCRR Part 234.3(a)(1)(ii)(e).

Parameter Monitored: VOC

Lower Permit Limit: 83.5 percent reduction by weight

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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.

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The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 2-6: Compliance Certification**  
**Effective between the dates of 05/18/2015 and 05/13/2018**

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

**Item 2-6.1:**

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

Emission Unit: 1-PRESS Process: 001	Emission Source: 00P07
Emission Unit: 1-PRESS Process: 001	Emission Source: 00P08
Emission Unit: 1-PRESS Process: 001	Emission Source: RTO01
Regulated Contaminant(s): CAS No: 0NY998-00-0	VOC

**Item 2-6.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This condition applies to Presses 7 & 8 when emissions are routed to the regenerative thermal oxidizer, RTO01.

As specified in 6NYCRR Part 234.3(a)(1)(ii)(e), where a flexographic printing process is employed, the capture system and the air cleaning device must provide for an overall reduction in volatile organic compound (VOC) emissions of at least 80 percent for a printing process that was first installed on or after March 14, 1995, and that is controlled by an add-on capture system and air cleaning equipment that was first installed after July 8, 2010. The overall removal efficiency consists of two components and is calculated as the product of the capture efficiency of the gas collection system and the destruction efficiency of the control equipment.

The individual VOC potential-to-emit (PTE) of Presses 7 & 8 IS LESS THAN the VOC project emission potential applicability threshold per 6NYCRR Part 231-13 New Source Review which is 40 tons per year (tpy) when calculated using an overall reduction in VOC emissions of 80% and a

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maximum VOC usage of 173.0 tpy and 159.4 tpy for Press 7 or Press 8, respectively, from information stated in the permit modification application dated July 22, 2013.

The facility has documented 100% capture via permanent total enclosure testing for Presses 7 & 8. Trinity is required to determine the destruction efficiency of RTO01 via reference method performance testing within 180 days of oxidizer start-up.

Initial compliance with this requirement will be demonstrated during performance testing as detailed elsewhere in this permit in a condition per 6NYCRR Part 234.4(a). Continuous compliance with the 80% overall removal efficiency will be assured by: (1) maintaining and operating the capture system as initially designed by the manufacturer, and (2) maintaining the destruction efficiency of the catalytic oxidizer as outlined elsewhere in this permit in a condition per 6NYCRR Part 234.3(a)(1)(ii)(e).

Parameter Monitored: VOC

Lower Permit Limit: 80 percent reduction by weight

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

**Condition 2-7: Compliance Certification**  
**Effective between the dates of 05/18/2015 and 05/13/2018**

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

**Item 2-7.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 2-7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This condition limits facility usage of volatile organic compound (VOC) containing materials on an individual press basis.

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This will assure that (1) the required minimum overall VOC removal efficiencies are maintained, and (2) the individual press VOC potential-to-emit (PTE) is less than the 40 ton per year VOC project emission potential applicability threshold per 6NYCRR Part 231-13 New Source Review. The individual press maximum VOC usage, based on information stated in the permit modification application dated July 22, 2013, and in information submitted by Trinity on November 25, 2013, is as follows:

Press 7 – 173.0 tpy  
Press 8 – 159.4 tpy  
Press 9 – 239.1 tpy  
Press 10 – 239.1 tpy

Trinity will maintain records of the usage of ink, varnish, adhesive, solvent, and other VOC containing products including, but not limited to purchase and/or production records, VOC content of products, and hours of operation. All records shall be kept on-site for a minimum of five years. This information shall be made available to the Department on request.

Monitoring Frequency: MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 2-8: Compliance Certification**  
**Effective between the dates of 05/18/2015 and 05/13/2018**

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

**Item 2-8.1:**

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

Emission Unit: 1-PRESS Process: 001	Emission Source: 00P09
Emission Unit: 1-PRESS Process: 001	Emission Source: 00P10
Emission Unit: 1-PRESS Process: 001	Emission Source: RTO01
Regulated Contaminant(s): CAS No: 0NY998-00-0	VOC

**Item 2-8.2:**

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Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This condition applies to the regenerative thermal oxidizer (RTO01).

Trinity must assure compliance with the minimum overall VOC removal efficiency rate of 83.5% for the capture and control devices. The overall VOC removal efficiency is the product of the capture efficiency of the gas collection system and the destruction efficiency of the oxidizer.

The minimum overall VOC removal efficiency rate is greater than required by 6NYCRR Part 234.3(a)(1)(ii)(d) or (e) because the individual VOC potential-to-emit (PTE) of Presses 9 & 10 is not less than the VOC project emission potential applicability threshold per 6NYCRR Part 231-13 New Source Review which is 40 tons per year (tpy).

The overall VOC removal efficiency must be verified via performance testing. The capture efficiency of emission source Press 10 (OOP10) must be determined in accordance with 40CFR60, Appendix A, Method 204 - Permanent Total Enclosure. The performance test determining the destruction efficiency of RTO01 must be performed, in accordance with 40CFR60, Appendix A, Method 18, 25 or 25A, once every five years, based on the date of the previous test. The performance test for RTO01 was completed on September 3, 2014.

The capture efficiency testing of the emission sources need only be repeated if physical changes to the air distribution system occur. Physical changes to the air distribution system include, but are not limited to, adding print stations to a press, increasing or decreasing the volumetric flow rate from the dryer (e.g., by changing the size of press fans/motors or removal or derating of dryers), and changing the static duct pressure.

Test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

Lower Permit Limit: 83.5 percent reduction by weight

Reference Test Method: EPA Method 18, 25, 25A, 204

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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**DESCRIPTION**

Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 30: Compliance Certification**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

**Applicable Federal Requirement:40CFR 63.820(a)(2), Subpart KK**

**Item 30.1:**

The Compliance Certification activity will be performed for the Facility.

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

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each new or existing facility at which publication rotogravure, product or packaging rotogravure, or wide web flexographic printing presses are operated for which the owner or operator chooses to commit to, and meets, the criteria of paragraphs §63.820 (a)(2)(i) and (ii) for purposes of establishing the facility to be an area source with respect to this subpart:

(i) Use less than 10 tons per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and

(ii) Use less than 25 tons per each rolling 12-month period of any combination of HAPs at the facility, including materials used for source categories or purposes other than printing and publishing.

Facilities meeting the above description are required to meet the provisions of recordkeeping and reporting as described in §63.829(d) and §63.830(b)(1).

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2013.  
Subsequent reports are due every 6 calendar month(s).

**Condition 31: Compliance Certification**

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**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 31.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each facility which commits to the criteria of 40CFR63.820(a)(2) for the purpose of capping his or her facility out of 40CFR63 Subpart KK shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria.

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

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2013.

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

**Condition 2-9: Compliance Certification**

**Effective between the dates of 05/18/2015 and 05/13/2018**

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

**Item 2-9.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 2-9.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Trinity Packaging Corporation (Trinity) is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) since the facility has potential pre-control device VOC emissions greater than 50 tons per year, which is the major source threshold level, and a control device is used to achieve compliance with an emission standard. This rule

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required Trinity to submit a CAM Plan which detailed and justified the monitoring indicators and performance criteria used at the facility to assure proper operation of the control device.

The CAM Plan, dated August, 2006, was prepared by Benchmark Environmental Engineering & Science, PLLC for Trinity. The plan was submitted to the Department and approved via the issuance of this permit. The plan has been incorporated into the permit via conditions per 6NYCRR Part 234.3(a)(1)(ii)(d) & (e), 234.4(a), 234.4(c), 234.7, and Subpart 228-2.

Trinity is required to maintain and operate all monitoring equipment at all times while printing is occurring. If either Trinity or the Department determines that there is a need for an improved monitoring plan, Trinity may be required to develop a Quality Improvement Plan (QIP) per 40CFR Part 64.8.

In addition to the semi-annual reporting requirements of 6NYCRR Part 201-6.5(c)(3)(ii), 201-6.5(c)(3), and 201-6.5(e) as outlined elsewhere in permit conditions, Trinity must, to satisfy the reporting requirements of 40CFR Part 64.9, include information with those semi-annual reports which summarizes:

1. the number, duration, and cause of exceedances; and corrective actions taken;
2. the number, duration and cause for monitor downtime incidents; and
3. description of the actions taken to implement a QIP during the reporting period, if necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

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

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

**Condition 33: Emission Point Definition By Emission Unit**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 33.1(From Mod 2):**

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



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Emission Unit: 1-PRESS

Emission Point: 00610

Height (ft.): 33

Diameter (in.): 6

NYTMN (km.): 4753.1

NYTME (km.): 194.1

Building: MAIN

Emission Point: 02000

Height (ft.): 40

Length (in.): 76

Width (in.): 42

NYTMN (km.): 4753.1

NYTME (km.): 194.1

Building: MAIN

**Condition 34: Process Definition By Emission Unit**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 34.1(From Mod 2):**

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

Emission Unit: 1-PRESS

Process: 001

Source Classification Code: 4-05-003-01

Process Description:

Process 001 consists of packaging flexographic printing operations using four (4) printing presses (00P07, 00P08, 00P09 and 00P10), five dryers (DRY07, DRY08, DRY09, DRY10 and DRY11), and a solvent-based combo laminator (00L01).

Emissions from each press, dryer, and the laminator when using solvent-based adhesives, are captured and controlled by a regenerative thermal oxidizer (RTO01). When the laminator is using solvent-free adhesives it is exhausted directly outside.

Emission Source/Control: RTO01 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: 00L01 - Process

Emission Source/Control: 00P07 - Process

Emission Source/Control: 00P08 - Process

Emission Source/Control: 00P09 - Process

Emission Source/Control: 00P10 - Process

Emission Source/Control: DRY07 - Process  
Design Capacity: 2.75 million BTUs per hour

Emission Source/Control: DRY08 - Process  
Design Capacity: 2.75 million BTUs per hour

Emission Source/Control: DRY09 - Process

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Design Capacity: 2.75 million BTUs per hour

Emission Source/Control: DRY10 - Process  
Design Capacity: 2.75 million BTUs per hour

Emission Source/Control: DRY11 - Process  
Design Capacity: 2.75 million BTUs per hour

**Item 34.2(From Mod 2):**

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

Emission Unit: 1-PRESS

Process: 004

Source Classification Code: 4-05-005-97

Process Description:

Process 004 consists of ten corona discharge surface treaters, one ozone decomposer, and the regenerative thermal oxidizer. The ozone emissions from the corona discharge surface treaters are controlled by the regenerative thermal oxidizer or the ozone decomposer.

Emission Source/Control: COD04 - Control  
Control Type: CATALYTIC REDUCTION

Emission Source/Control: RTO01 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: CDST4 - Process

Emission Source/Control: CDST5 - Process

Emission Source/Control: CDST7 - Process

Emission Source/Control: CDST8 - Process

Emission Source/Control: CDST9 - Process

Emission Source/Control: CDT10 - Process

Emission Source/Control: CDT11 - Process

Emission Source/Control: CDT12 - Process

Emission Source/Control: CDT13 - Process

Emission Source/Control: CDT14 - Process

**Condition 2-10: Compliance Certification**

Effective between the dates of 05/18/2015 and 05/13/2018

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

**Item 2-10.1:**



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

Emission Unit: 1-PRESS  
Process: 001 Emission Source: 00L01

Emission Unit: 1-PRESS  
Process: 001 Emission Source: RTO01

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

**Item 2-10.2:**

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,

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adhesive primers, and process related waste materials;  
and

(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.

The initial report is due 7/30/2015.

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

**Condition 2-11: Compliance Certification**  
**Effective between the dates of 05/18/2015 and 05/13/2018**

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

**Item 2-11.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-PRESS

Process: 001

Emission Source: 00L01



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Emission Unit: 1-PRESS

Process: 004

Emission Source: RTO01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 2-11.2:**

Compliance Certification shall include the following monitoring:

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.

The initial report is due 7/30/2015.

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

**Condition 2-12: Compliance Procedures and Test Methods for Air Pollution Control Equipment**

**Effective between the dates of 05/18/2015 and 05/13/2018**

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

**Item 2-12.1:**

This Condition applies to:

Emission Unit: 1PRESS

Process: 001

Emission Source: 00L01

Emission Unit: 1PRESS

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Process: 001

Emission Source: RTO01

**Item 2-12.1:**

This Condition applies to Emission Unit: 1-PRESS

**Item 2-12.2.3:**

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.

**Condition 36: Once in, always in**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

**Applicable Federal Requirement:6 NYCRR 234.1 (c)**

**Item 36.1:**

This Condition applies to Emission Unit: 1-PRESS

**Item 36.2:**

A printing process that is subject to the provisions of Part 234 will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.

**Condition 1-24: Compliance Certification**  
**Effective between the dates of 02/06/2014 and 05/13/2018**

**Applicable Federal Requirement:6 NYCRR 234.5**

**Item 1-24.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS

**Item 1-24.2:**

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

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all written or oral contracts under the terms of which a coating, ink or adhesive is to be applied to a substrate.

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 this Part.

A person selling an ink, coating, or adhesive used in a printing process subject to this Part must, upon request, provide the buyer with certification of the VOC content of the coating, ink or adhesive supplied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2014.

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

**Condition 44: Compliance Certification**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

**Applicable Federal Requirement:6 NYCRR 234.6**

**Item 44.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 44.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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



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

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2013.

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

**Condition 2-13: Compliance Certification**  
**Effective between the dates of 05/18/2015 and 05/13/2018**

**Applicable Federal Requirement:6 NYCRR 234.7**

**Item 2-13.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 2-13.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks, volatile organic compounds (VOC) and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the department's representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the commissioner's representative in a format acceptable to the Department. Records must be maintained at the facility for a period of five years.

The facility shall maintain the following records for each ink, cleaning solvent, and other VOC used in the printing process, on a yearly basis:

1. The brand and product name or code for the material.
2. The quantity of material used during the calendar year.



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3. The VOC content of the material.

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the yearly log are to be kept on site.

Upon written request from the Department, Trinity shall report or make available monthly recordkeeping to demonstrate compliance.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).

**Condition 46: Compliance Certification**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

**Applicable Federal Requirement:6 NYCRR 234.7**

**Item 46.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS

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

**Item 46.2:**

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.

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2013.

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

**Condition 47: Compliance Certification**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

**Applicable Federal Requirement:6 NYCRR 234.8**

**Item 47.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS

**Item 47.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A person shall not cause or allow emissions having an average opacity of 10 percent or greater for any consecutive six minute period from any emission source subject to this Part into the outdoor atmosphere.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2013.

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

**Condition 2-14: Compliance Certification**  
**Effective between the dates of 05/18/2015 and 05/13/2018**

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

**Item 2-14.1:**

The Compliance Certification activity will be performed for:



Emission Unit: 1-PRESS  
Process: 001 Emission Source: RTO01

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

**Item 2-14.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Trinity Packaging Corporation (Trinity) will operate a regenerative thermal oxidizer (RTO01) to control volatile organic compounds (VOC). Trinity will assure that all VOC-laden gas streams from operating presses are routed to a properly operating oxidizer. This is accomplished by the interlocked oxidizer and presses system, which only allows operation of a press if the combustion chamber temperature of RTO01 is greater than the set point, which will be at least 1500 degrees F based on manufacturer specifications. This assures that a VOC-laden gas stream from a press in printing mode cannot pass through an insufficiently warmed oxidizer which would be incapable of sufficient destruction efficiency.

Trinity will continuously monitor the combustion chamber temperature of RTO01. The temperature will be maintained at or above 1500 degrees F to assure the minimum destruction efficiency based on manufacturer specifications.

A continuous monitor to measure the combustion chamber temperature must be installed, periodically calibrated, and operated at all times RTO01 is operating. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. Trinity shall maintain continuous recording charts of the combustion chamber temperatures. The continuous chart recordings and the calibration data shall be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Parameter Monitored: TEMPERATURE  
Lower Permit Limit: 1500 degrees Fahrenheit  
Monitoring Frequency: CONTINUOUS  
Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT  
DURING STARTUP/SHUTDOWN  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



Reports due 30 days after the reporting period.  
The initial report is due 7/30/2015.  
Subsequent reports are due every 6 calendar month(s).



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

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

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

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

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

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

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



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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

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

**Condition 50: Contaminant List**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 50.1:**

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

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

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

**Condition 51: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 51.1:**

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

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to



the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

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

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

**Condition 52: Unavoidable noncompliance and violations**  
**Effective between the dates of 05/14/2013 and 05/13/2018**

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

**Item 52.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's

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representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) 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.