

**Division of Air Resources
Permit Review Report**

Permit ID: 6-2218-00017/00009

Renewal Number: 2

Modification Number: 1 08/31/2020

Facility Identification Data

Name: KNOWLTON TECHNOLOGIES LLC

Address: 213 FACTORY ST

WATERTOWN, NY 13601

Owner/Firm

Name: KNOWLTON TECHNOLOGIES LLC

Address: 213 FACTORY ST

WATERTOWN, NY 13601, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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317 WASHINGTON ST

WATERTOWN, NY 13601-3787

Phone:

Division of Air Resources:

Name: MARK P NOWAK

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Air Permitting Contact:

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213 Factory St

Watertown, NY 13601

Phone:3157820600

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

The facility has submitted this permit modification to address requirements of a Department consent order. The facility has addressed the implementation of updated federal and state rules. The facility is permitted

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for the operation of 3 paper machines (Emission Unit 1-PAPER), solvent coating operations and pollution control equipment (Emission Unit 1-SVSAT), a glue laminator (Emission Unit 1-AQSAT), solvent storage tanks (Emission Unit 1-TANKS), and an emergency generator (Emission Unit 1-GENER).

Attainment Status

KNOWLTON TECHNOLOGIES LLC is located in the town of WATERTOWN in the county of JEFFERSON.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

The facility is permitted for the operation of 3 paper machines (Emission Unit 1-PAPER), solvent coating operations and pollution control equipment (Emission Unit 1-SVSAT), a glue laminator (Emission Unit 1-AQSAT), solvent storage tanks (Emission Unit 1-TANKS), and an emergency generator (Emission Unit 1-GENER).

Permit Structure and Description of Operations

The Title V permit for KNOWLTON TECHNOLOGIES LLC is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

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combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

KNOWLTON TECHNOLOGIES LLC is defined by the following emission unit(s):

Emission unit 1SVSAT - This emission unit involves solvent coating operations. It consists of a resin kitchen with mix vessels (mixvs) and solvent wash tank (wshtk), two paper saturator sections (satur) a unwind/wind area (windu), a dryer section (dryer), and final winder area (fwind). Hap and voc emissions from these sources are controlled by a boiler/incinerator (blrin), and are exhausted through EP M0001. After the dryer section, there is an inking station (inkst), which also vents to the boiler/incinerator.

Emission unit 1SVSAT is associated with the following emission points (EP):
M0001

Process: BLR is located at Building BBISL - This process involves the boiler/incinerator, which provides process and comfort heating to the facility. The boiler is fired with natural gas.

Process: INK is located at Building BBISL - This process consists of the ink station, where stripes may be applied to the back side of coated paper. Ink is applied using a stainless steel cylinder. This process is subject to the paper and other web coating MACT.

Process: MIX is located at Building BBISL - This process involves the mixing of coatings for use on the coating lines. The mixing process is subject to the friction materials manufacturing MACT.

Process: SS1 is located at Building BBISL - This process involves the solvent saturator, which is used to coat paper substrate. Specifically, this process consists of two paper saturator sections, an unwind/wind area, a dryer section, and a final winder area. The solvent saturator is subject to the paper and other web coating MACT.

Process: WAS is located at Building BBISL - This process involves the solvent wash tank, which is used to remove residual resin mixture from the saturator trough and rollers.

Emission unit 1GENER - This emission unit consists of one 115 hp diesel-powered emergency generator for operation of a fire pump

Emission unit 1GENER is associated with the following emission points (EP):
GEN01

Process: GEN is located at Building MAIN - Process involves the operation of an emergency generator for the supply of power to a fire pump.

Emission unit 1PAPER - This emission unit consists of 3 paper machines (pap01, pap02, and pap03) each of which includes a dryer section. Emissions vent from two points for paper machine 1, three points

Emission unit 1PAPER is associated with the following emission points (EP):

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P1EP1, P1EP2, P2EP1, P2EP2, P2EP3, P3EP1

Process: PMS is located at Building MAIN - This process involves making paper in 3 paper machines, each of which includes a dryer section.

Emission unit 1AQSAT - This emission unit consists of the glue laminator (GLLAM). Water-based low-VOC content glue is applied to a continuously moving sheet of media which is then affixed to a second continuously moving sheet of media and then pressed to form a single laminated sheet. Emissions from the glue are vented through emission point LAM01.

Emission unit 1AQSAT is associated with the following emission points (EP):

LAM01

Process: GLL is located at Building BBISL - This process involves the use of water-based glues in the glue laminator. This process is subject to the paper and other web coating MACT.

Emission unit 1TANKS - This emission unit consists of ten underground storage tanks which supply materials to the solvent saturator. These include: Two 10,000 gallon methanol storage tanks designated as Methanol Tank #1 (emission source TANK1) and Methanol Tank #2 (emission source TANK2) that vent to a common emission point (TANK1); four 8,000 gallon designated as TANK3, TANK4, TANK5, and TANK6 that vent to a common emission point (TANK3); two 8,000 gallon designated as TANK7 and TANK8, and two 5,000 gallon storage tanks designated as TANK9 and TANK10 with all four vented to a common emission point (TANK7). TANK4 and TANK9 normally do not contain HAP while the remaining tanks normally contain greater than 5 wt% HAP. All tanks vapor pressure at storage conditions are below 4.0 PSIA. The eight tanks with less than 10,000 gallon capacity are existing vessels exempt per 6 NYCRR 201-3.2(c)(25).

Emission unit 1TANKS is associated with the following emission points (EP):

TANK1, TANK3, TANK7

Process: T01 is located at Building TNKFM - This process involves the filling and storage operations for tanks

Title V/Major Source Status

KNOWLTON TECHNOLOGIES LLC is subject to Title V requirements. This determination is based on the following information:

This facility is a major source of Methanol, phenol, total hap and VOC.

Program Applicability

The following chart summarizes the applicability of KNOWLTON TECHNOLOGIES LLC with regards to the principal air pollution regulatory programs:

Regulatory Program

Applicability

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

NOTES:

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

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

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

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

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

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

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

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RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

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

SIC Code	Description
2672	PAPER COATED AND LAMINATED, NEC
2621	PAPER MILLS EXC BUILDING PAPER

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
2-01-001-02	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating
3-07-013-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - MISCELLANEOUS PAPER PRODUCTS
4-02-013-01	Other Not Classified SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING

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4-02-013-03	Coating Operation SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING
4-02-013-05	Coating Mixing SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING
4-02-044-35	Equipment Cleanup SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - FABRIC
4-05-005-97	COATING, TRANSFER COATING LAMINATION: LAMINATING DEVICE PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL
4-07-008-14	OTHER NOT CLASSIFIED ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - ALCOHOLS Isopropyl Alcohol: Working Loss

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000092-52-4	1, 1 BIPHENYL	85			
000096-23-1	1, 3-DICHLORO- 2-PROPANOL	2278			
000108-10-1	2-PENTANONE, 4-METHYL	902			
000075-07-0	ACETALDEHYDE	473		190	
000108-05-4	ACETIC ACID ETHENYL ESTER	151			
000630-08-0	CARBON MONOXIDE	37716			
000067-66-3	CHLOROFORM	8		3	
000067-64-1	DIMETHYL KETONE	25329			
000141-78-6	ETHYL ACETATE	910			
000064-17-5	ETHYL ALCOHOL (ETHANOL)	80130			
000079-06-1	ETHYLENE CARBOXAMIDE	88		1	

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000050-00-0	FORMALDEHYDE	4208	47
000067-63-0	ISOPROPYL ALCOHOL	76300	
000067-56-1	METHYL ALCOHOL	170848	
000078-93-3	METHYL ETHYL KETONE	13580	
0NY210-00-0	OXIDES OF NITROGEN	44900	
0NY075-00-0	PARTICULATES	4487	
000108-95-2	PHENOL	33168	
0NY075-00-5	PM-10	3949	
000107-13-1	PROPENENITRIL E	108	
008052-41-3	STODDARD SOLVENT	272	
000100-42-5	STYRENE	2	
007446-09-5	SULFUR DIOXIDE	269	
0NY100-00-0	TOTAL HAP	210035	
0NY998-00-0	VOC	383511	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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 Part 201-6.2(a)(4)

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

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

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

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

The permittee must comply with all conditions of the Title V facility permit. Any permit 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

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Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)

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

Item 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 Part 201-6.4(a)(9)

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

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

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- 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 Part 201-6.4(i)

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

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- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item 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.

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Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item_02

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.

Regulatory Analysis

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Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
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FACILITY	ECL 19-0301	99	Powers and Duties of the Department with respect to air pollution control
1-SVSAT/-/BLR	40CFR 60-A.12	66	General provisions - Circumvention
1-SVSAT/-/BLR	40CFR 60-A.14	67	General provisions - Modification
1-SVSAT/-/BLR	40CFR 60-A.4	63	General provisions - Address
1-SVSAT/-/BLR	40CFR 60-A.7 (a)	64	Notification and Recordkeeping
1-SVSAT/-/BLR	40CFR 60-A.9	65	General provisions - Availability of information
1-SVSAT/-/BLR	40CFR 60-Dc.48c (a)	68	Reporting and Recordkeeping Requirements.
1-SVSAT/-/BLR	40CFR 60-Dc.48c (g)	69	Reporting and Recordkeeping Requirements.
1-SVSAT/-/BLR	40CFR 60-Dc.48c (i)	70	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 63-A	1 -16	Subpart A - General Provisions apply to all NESHAP affected sources
1-SVSAT	40CFR 63-A	39	Subpart A - General Provisions apply to all NESHAP affected sources
FACILITY	40CFR 63-DDDDD	1 -17, 1 -18, 1 -19	Boilers and Process Heaters Major Source NESHAP rule
FACILITY	40CFR 63-DDDDD.7495 (d)	1 -20	ICI Boiler Major Source NESHAP - Notification Requirements
FACILITY	40CFR 63-DDDDD.7510 (e)	1 -21	ICI Boiler Major Source NESHAP - Initial Compliance Date for Existing Sources
FACILITY	40CFR 63-DDDDD.7521 (f)	1 -22	ICI Boiler Major Source NESHAP - Classification of Gaseous Fuels
FACILITY	40CFR 63-DDDDD.7530 (e)	1 -23	ICI Boiler Major Source NESHAP - Certification of Energy Assessment
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Applicability Discussion:

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as

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listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

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

6 NYCRR 201-6.4 (a) (7)

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

6 NYCRR 201-6.4 (a) (8)

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

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

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

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

6 NYCRR 201-6.4 (d) (4)

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

6 NYCRR 201-6.4 (e)

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

6 NYCRR 201-6.4 (f) (6)

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

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2

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

40 CFR Part 68

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

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, KNOWLTON TECHNOLOGIES LLC has been determined to be subject to the following regulations:

40 CFR 60.12

This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

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40 CFR 60.14

This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.

40 CFR 60.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40 CFR 60.48c (a)

This regulation requires the owner and operator of each affected facility to submit notification of the date of construction or reconstruction, anticipated startup, and actual startup of the facility. The notification must include the following information:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

40 CFR 60.48c (g)

The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40 CFR 60.48c (i)

This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

40 CFR 60.7 (a)

This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

40 CFR 60.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

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40 CFR 63.2343

This regulation requires if an addition or change other than reconstruction is made that causes the total actual annual facility-level organic liquid loading volume to exceed 800,000 gallons, Kodak must comply with the transfer rack requirements specified in §63.2346(b) immediately; that is, be in compliance the first day of the period following the end of the 3-year period triggering the control criteria.

40 CFR 63.3320 (b) (1)

This citation requires the facility operating a web coating line to reduce organic HAP emissions from the emission unit by 95%.

40 CFR 63.3321 (a)

This citation requires the facility operating a web coating line to reduce organic HAP emissions from the emission unit thru operating limits established during a source test.

40 CFR 63.3330 (a)

This citation requires the facility operating a web coating line to comply with this regulation by December 5, 2005.

40 CFR 63.3350 (e)

This citation requires the facility operating a web coating line with a control device, to operate the control device in accordance with the requirements of the regulation.

40 CFR 63.3350 (f)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to monitor the oxidizer with calibrated equipment.

40 CFR 63.3360 (e)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to conduct a performance test to establish the level of control.

40 CFR 63.3360 (e) (1)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to conduct a performance test using the required EPA Methods.

40 CFR 63.3360 (e) (2)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to conduct a performance test and to record data to establish the conditions during proper operation.

40 CFR 63.3360 (e) (3) (i)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to establish

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and monitor the temperature for proper control.

40 CFR 63.3360 (f)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to establish capture efficiency using the proper EPA Methods.

40 CFR 63.3360 (g)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, that chooses to take into account, the amount of VOC retained in the coating line, must provide a testing protocol to EPA.

40 CFR 63.3370 (e)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to demonstrate compliance with emission limits monthly.

40 CFR 63.3370 (k) (1)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to demonstrate compliance with emission limits with an initial compliance test.

40 CFR 63.3370 (k) (2) (i)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to demonstrate compliance with emission limits using the proper equation.

40 CFR 63.3370 (k) (3) (i)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to demonstrate compliance with emission limits by operating the device properly.

40 CFR 63.3400 (b)

This condition requires that the facility submit an initial notification no later than one year before the facility needs to be in compliance with this subpart. The notification will include basic information about the facility and will be submitted to EPA Region 2 and the NYSDEC. A permit application may be submitted instead of an initial notification in certain cases.

40 CFR 63.3400 (c)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to submit reports semi-annually.

40 CFR 63.3400 (d)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to submit a testing protocol before the performance test.

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40 CFR 63.3400 (e)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to submit a compliance status report.

40 CFR 63.3400 (f)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to submit a performance test report.

40 CFR 63.3400 (g)

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to submit start-up, shutdown, malfunction reports.

40 CFR 63.3410

This citation requires the facility operating a web coating line with a non-catalytic oxidizer, to retain compliance records for 5 years.

40 CFR 63.6605 (a)

This condition states that the facility must meet all emission limits and operating limits that this rule imposes at all times.

40 CFR 63.6605 (b)

This condition requires the facility to operate their engine(s) so that emissions of hazardous air pollutants are minimized during periods when the engine(s) are starting up, shutting down, and malfunctioning.

40 CFR 63.6625 (e)

This regulation requires the owners or operator of an existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions, an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

40 CFR 63.6625 (f)

This condition reduces the emission of hazardous air pollutants by requiring existing emergency engines greater than or equal to 500 brake horsepower located at a major source of HAP emissions and existing emergency engines located at an area source of HAP emissions to install a non-resettable hour meter.

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40 CFR 63.6625 (h)

This regulation requires the owner or operator of a reciprocating internal combustion engine, operating at a major source of hazardous air pollutants, to minimize the idling time of the engine at startup. Startup time is limited to 30 minutes or less.

40 CFR 63.6640 (f)

This condition states the operation requirements for emergency engines.

40 CFR 63.6650 (f)

This condition states when information in the compliance report required by the NESHAP can be used for the semiannual monitoring report required for Title V.

40 CFR 63.6655 (f)

This regulation requires the owner/operator of a reciprocating internal combustion engine to record the number of hours the engine has been used, in both emergency and non-emergency use.

40 CFR 63.6660

This condition specifies how long the facility must keep records of the results of the monitoring that was done to prove that the engine(s) was meeting the emission limits in this rule.

40 CFR 63.7495 (d)

This condition states the notification requirements of the boiler MACT.

40 CFR 63.7510 (e)

This condition states that the owner or operator must demonstrate initial compliance no later than 180 days after the compliance date

40 CFR 63.7521 (f)

This condition states the procedures for classifying a gaseous fuel as gas 1 or gas 2

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40 CFR 63.7530 (e)

This requirement outlines demonstration of initial compliance with respect to an energy assessment

40 CFR 63.7530 (f)

This condition states the owner or operator must submit the notification of compliance status in the initial compliance demonstration.

40 CFR 63.7540 (a)

This condition states how to demonstrate continuous compliance with emission limits, work practice standards, and operating limits.

40 CFR 63.7545 (e)

This condition states the requirements of the notification of compliance status

40 CFR 63.7550 (b)

This condition states when reports must be submitted.

40 CFR 63.7550 (c)

This condition states the requirements for the compliance report

40 CFR 63.7550 (d)

This condition states the requirements for reporting deviations at facilities not using a continuous monitoring system

40 CFR 63.7555 (a)

This condition states what records must be kept

40 CFR 63.7555 (g)

This condition states the recordkeeping requirements for the other gas 1 subcategory

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40 CFR 63.9495 (a)

This citation requires the facility operating solvent mixers to comply with this regulation by October 18, 2005.

40 CFR 63.9500 (a)

This condition states that the facility must reduce the hazardous air pollutants that are emitted to the atmosphere by 70%.

40 CFR 63.9505 (a)

This condition requires the facility to be in compliance with the 70% or 85% reduction of emissions at all times except during times when the equipment is starting up, shutting down, or has malfunctioned.

40 CFR 63.9505 (b)

This condition requires the facility to keep the equipment used to control air pollution in good working order in order to prevent the air pollution equipment from failing as much as possible.

40 CFR 63.9505 (c)

This condition requires that the facility develop a plan which tells the facility operators how to handle the equipment during periods when the equipment is starting up, shutting down, and malfunctioning, in order to minimize the amount of hazardous air pollutants that escape to the atmosphere.

40 CFR 63.9515 (a)

This condition requires the facility to be in compliance initially with the 70% reduction for solvent mixers over 2000 pounds by requiring the facility to calculate the emissions of hazardous air pollutants during the first 7 days of operation and calculate whether the emissions are below the 70% limit.

40 CFR 63.9530 (c)

This condition requires the facility to report any instances where the emission limits in this rule are not met. These are deviations from the limit, but are not necessarily violations of the rule.

40 CFR 63.9530 (e)

This condition states that if the facility exceeds the emission limits in this rule during periods when the equipment is starting up, shutting down, or malfunctioning, the exceedance is not a violation if they demonstrate that their startup, shutdown, malfunction plan was followed during the exceedance period to show that the facility properly tried to reduce the emissions of hazardous air pollutants during the period.

40 CFR 63.9535

This citation requires the facility operating solvent mixers to comply with the submission of any required reports by the deadlines set forth in the regulation.

40 CFR 63.9540

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This condition requires the facility to periodically report the status of their compliance with this rule to NYSDEC. Some of the items to be included in this report are any exceedances of the emission limits, and periods of startup, shutdown, or malfunction, and a signature from a responsible official.

40 CFR 63.9540 (d)

This condition requires the facility to immediately report any instance when the startup, shutdown, malfunction plan was not followed.

40 CFR 63.9545

This condition details the information that the facility must keep available for inspectors to view.

40 CFR 63.9550

This condition requires the facility to keep records for at least 5 years and that the records must be available on site for at least 2 of those 5 years.

40 CFR 63.9570

This citation requires the facility operating solvent mixers to submit any request to use alternative compliance methods for approval.

40 CFR Part 63, Subpart A

The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40 CFR 63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that describe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

40 CFR Part 63, Subpart DDDDD

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP emissions. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

6 NYCRR 201-6.5 (a)

This section identifies state enforceable requirements for Title V permits.

6 NYCRR 211.1

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

6 NYCRR 212-1.6 (a)

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

6 NYCRR 212-2.1

Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point are restricted as follows:

- (a) For an air contaminant listed in section 212-2.2 table 2 – high toxicity air contaminant list, of this Subpart, the facility owner or operator shall either limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants, of this Subpart for the environmental rating assigned to the contaminant by the department.
- (b) For any air contaminant not listed on table 2, unless it is a solid particulate described in subdivision (c) of this section, the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in subdivision 212-2.3(a), table 3 – degree of air cleaning required for criteria air contaminants of this Subpart, or subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants of this Subpart, as applicable, for the environmental rating assigned to the contaminant by the department.
- (c) For a solid particulate assigned an environmental rating of B or C emitted from a process emission source, the facility owner or operator shall not allow emissions of particulate to exceed the requirements specified in section 212-2.4 of this Subpart.

6 NYCRR 212-2.3 (b)

Table 4 of 212-2.3 describes the reduction in emissions required for a non-criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of controlled applied.

6 NYCRR 212-2.4 (b)

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

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 228-1.1 (a) (3)

This citation dictates that any coating line, which is or becomes subject to the requirements of this regulation, will remain subject to its requirements even if the reason they were subject later falls below the applicability threshold.

6 NYCRR 228-1.3 (a)

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

6 NYCRR 228-1.3 (b)

This requirement outlines recordkeeping for this Part

6 NYCRR 228-1.3 (b) (1)

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

6 NYCRR 228-1.3 (c)

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

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6 NYCRR 228-1.3 (d)

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

6 NYCRR 228-1.3 (e) (2)

This citation allows any facility to use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits required by the regulation.

6 NYCRR 228-1.4 (d) (3)

The citation specifies the maximum VOC content of a coating allowed when coating paper, film or foil.

6 NYCRR 228-1.5 (b)

This citation requires the facility coating lines to achieve 98% control efficiency.

6 NYCRR 228-1.6 (a)

This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirements of the regulation.

6 NYCRR 228-1.6 (h)

This citation requires the facility owner or operator to divulge any information or record showing noncompliance with the requirements of the regulation to the Department within 30 days and to maintain this information on the premises for a period of 5 years.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

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Compliance Certification

Summary of monitoring activities at KNOWLTON TECHNOLOGIES LLC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

1-SVSAT/-/BLR	68	record keeping/maintenance procedures
1-SVSAT/-/BLR	69	record keeping/maintenance procedures
1-SVSAT/-/BLR	70	record keeping/maintenance procedures
FACILITY	1-17	record keeping/maintenance procedures
FACILITY	1-18	record keeping/maintenance procedures
FACILITY	1-19	record keeping/maintenance procedures
FACILITY	1-22	record keeping/maintenance procedures
FACILITY	1-23	record keeping/maintenance procedures
FACILITY	1-25	record keeping/maintenance procedures
FACILITY	1-26	record keeping/maintenance procedures
FACILITY	1-28	record keeping/maintenance procedures
FACILITY	1-29	record keeping/maintenance procedures
FACILITY	1-30	record keeping/maintenance procedures
FACILITY	1-31	record keeping/maintenance procedures
FACILITY	1-32	record keeping/maintenance procedures
FACILITY	1-33	record keeping/maintenance procedures
FACILITY	1-34	record keeping/maintenance procedures
1-SVSAT	40	record keeping/maintenance procedures
1-SVSAT	41	record keeping/maintenance procedures
1-SVSAT	43	monitoring of process or control device parameters as surrogate
1-SVSAT	44	monitoring of process or control device parameters as surrogate
1-SVSAT	45	record keeping/maintenance procedures
1-SVSAT	46	record keeping/maintenance procedures
1-SVSAT	47	intermittent emission testing
1-SVSAT	49	monitoring of process or control device parameters as surrogate
1-SVSAT	50	record keeping/maintenance procedures
1-SVSAT	52	record keeping/maintenance procedures
1-SVSAT	53	intermittent emission testing
1-SVSAT	54	record keeping/maintenance procedures
1-SVSAT	55	record keeping/maintenance procedures
1-SVSAT	56	record keeping/maintenance procedures
1-SVSAT	57	record keeping/maintenance procedures
1-SVSAT	58	record keeping/maintenance procedures
1-SVSAT	59	record keeping/maintenance procedures
1-SVSAT	60	record keeping/maintenance procedures
1-SVSAT	61	record keeping/maintenance procedures
1-SVSAT	62	record keeping/maintenance procedures
1-SVSAT/-/MIX	76	record keeping/maintenance procedures
1-SVSAT/-/MIX	77	record keeping/maintenance procedures
1-SVSAT/-/MIX	78	record keeping/maintenance procedures
1-SVSAT/-/MIX	79	record keeping/maintenance procedures
1-SVSAT/-/MIX	80	intermittent emission testing
1-SVSAT/-/MIX	81	record keeping/maintenance procedures
1-SVSAT/-/MIX	82	record keeping/maintenance procedures
1-SVSAT/-/MIX	83	record keeping/maintenance procedures
1-SVSAT/-/MIX	84	record keeping/maintenance procedures
1-SVSAT/-/MIX	85	record keeping/maintenance procedures
1-SVSAT/-/MIX	86	record keeping/maintenance procedures

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1-SVSAT/-/MIX	87	record keeping/maintenance procedures
1-GENER/-/GEN	1-44	record keeping/maintenance procedures
FACILITY	1-36	record keeping/maintenance procedures
FACILITY	1-37	monitoring of process or control device parameters as surrogate
1-GENER/GEN01/GEN/RICE1	1-45	record keeping/maintenance procedures
1-GENER/GEN01/GEN/RICE1	1-46	record keeping/maintenance procedures
FACILITY	1-39	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	1-1	record keeping/maintenance procedures
FACILITY	1-5	work practice involving specific operations
1-SVSAT	34	work practice involving specific operations
FACILITY	1-2	record keeping/maintenance procedures
FACILITY	1-8	monitoring of process or control device parameters as surrogate
FACILITY	1-48	record keeping/maintenance procedures
FACILITY	1-49	work practice involving specific operations
FACILITY	1-50	monitoring of process or control device parameters as surrogate
FACILITY	1-51	work practice involving specific operations
FACILITY	1-9	intermittent emission testing
1-SVSAT/M0001	96	monitoring of process or control device parameters as surrogate
FACILITY	1-10	monitoring of process or control device parameters as surrogate
FACILITY	1-11	record keeping/maintenance procedures
1-AQSAT	1-40	record keeping/maintenance procedures
FACILITY	1-13	record keeping/maintenance procedures
FACILITY	1-14	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
1-SVSAT	35	record keeping/maintenance procedures
1-SVSAT	36	monitoring of process or control device parameters as surrogate
1-SVSAT	37	monitoring of process or control device parameters as surrogate
1-SVSAT	38	monitoring of process or control device parameters as surrogate
1-AQSAT	1-41	record keeping/maintenance procedures
FACILITY	1-15	record keeping/maintenance procedures

Basis for Monitoring

PRR Monitoring Requirements

Each monitoring activity is to ensure the facilities compliance with permit conditions.

6NYCRR228-1.5(b) : Condition 36, 37, 38 :This requirement has multiple monitoring conditions in this permit. One to monitor the temperature of VOC control devices, one for capture of VOCs, and one for the pressure of VOC control devices. These are required to assure that the control devices are operating within acceptable ranges. The conditions are as follows:

The capture and control system of emission unit 1-SVSAT must achieve at least 98% overall removal efficiency of VOC. To demonstrate that the capture and control system is operating at an overall VOC removal efficiency of 98% or greater, the facility will continually monitor the combustion temperature of

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the boiler/incinerator (emission source: BLRIN). The required minimum temperature, based on an hourly average of readings taken at 15 minute intervals, will be 1425 degrees Fahrenheit.

The capture and control system of emission unit 1-SVSAT must achieve at least 98% overall removal efficiency of VOC. To demonstrate compliance with this limit the facility will perform an emission test to determine the overall removal efficiency of the capture and control system at least once during the term of this permit.

In order to ensure 100% capture efficiency of emissions from emission unit 1-SVSAT the negative pressure of the exhaust system will be continuously monitored. Monitoring will be conducted at a location upstream of the booster fan, which is located upstream of the boiler/incinerator (emission source: BLRIN). The required maximum pressure, based on an hourly average of readings taken at 15 minute intervals, will be -1.5 inches water column.

40 CFR 63 DDDDD : Conditions 1-17, 1-18, 1-19, 1-20, 1-21, 1-22, 1-25, 1-26, 1-28, 1-29, 1-30, 1-32: The facility must demonstrate that the combination of VOC and natural gas meets the definition of Other Gas 1 fuel and demonstrate compliance with the requirements for Other Gas 1 fuel. The facility is being required to determine the concentration of mercury in the fuel, develop a site specific fuel analysis plan and test the fuel in this subcategory according to the specifications in these conditions.

An existing boiler located at a major source facility must have a one-time energy assessment completed by a qualified energy assessor. This is a single occurrence monitoring event that shall be reported upon by request. The facility is then required to submit a signed notification of compliance status that the energy assessment was completed according to the requirements of Table 3 of this Subpart.

The facility must conduct an annual tune up of the boiler to demonstrate continuous compliance. This tune up should be completed utilizing the fuel that provided the most heat input in the previous 12 months.

Reports outlining compliance with this subpart are required as outlined in 40 CFR 63.7550. These reports are most often required annually, though may have a different reporting frequency due to non-compliance, or completion of a fuel analysis. This regulation also outlines what information should be required in these reports.

Records are to be maintained at the facility of each notification and report that was submitted to comply with this subpart. This includes all annual reports, initial notifications, notification of compliance status, performance tests, fuel analyses, or other compliance demonstrations.

40 CFR 63 EEEE : Conditions 1-33, 1-34 :The tanks on site that are subject to this subpart are not subject to control based on the criteria outlined in Table 2 of this subpart, therefore the facility is subject to reduced monitoring. The facility must submit required compliance reports, and be prepared to submit subsequent reports if a qualifying event occurs. The facility must maintain records of the annual average true vapor pressure of the total Table 1 organic HAP that verifies

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the storage tank is not required to be controlled. This document must be kept up to date. Similarly as discussed above, these circumstances also apply to the transfer racks on site.

The facility may become subject to additional requirements or compliance reporting if: any storage tank or transfer rack becomes subject to control, any storage tank equal to or greater than 5,000 gallons became part of the affected sources but is not subject to any of the emission limitations, operating limits, or work practices of this subpart, any transfer rack became part of the affected source, or any additional information required by the initial compliance report has changed.

40 CFR 63 ZZZZ : Condition 1-35, 1-36, 1-37, 1-38, 1-39, 1-40, 1-41, 1-42 : the facility operates a 115 hp emergency rice and is therefore required to comply with ZZZZ.

A non-resettable hour meter must be installed on the engine. The engines start up time must be minimized to a period that appropriate and safe loading of the engine can occur. This startup time cannot exceed 30 minutes. The facility must abide by requirements in ZZZZ to remain an emergency source. Non-emergency operation is limited to 50 hrs per year. Notifications must be submitted in accordance to this subpart. The owner/operator of this engine must keep records of the hours of operation of the engine that is recorded via the non-resettable hour meter. These records must outline how many hours are spent for emergency operation and how many hours are spent for non-emergency operation.

All records must be maintained in a suitable and readily available form for review.

6 NYCRR Part 212 : Condition 1-8, 1-9, 1-47, 1-48, 1-49 : This permit includes changes to part 212. The below monitoring conditions reflect this.

The facility is required to check process sources facility wide for visible emissions on a monthly basis. Should the facility observe visible emissions, corrective actions must be taken and another observation made. If visible emissions persist, the facility shall conduct a method 9 within 24 hrs and notify the Department. The facility shall report on this condition semi annually.

Another condition limits a process source from emitting particulates exceeding 0.05 grains per cubic foot of exhaust gas. The facility will perform testing and report on this condition upon request

The facility maintains a VOC RACT Variance for emission unit 1-TANKS, allowing the facility to utilize a methanol throughput of 2,500,000 pounds per year. This condition is unchanged from the original application, but has received an updated citation. Variances must be reevaluated each renewal term.

NYCRR Part 201-7 : The facility has completed modelling demonstrating that offsite concentrations of formaldehyde represent a negligible cancer risk when the hours of operation of 1-SVSAT are limited to 7245 hrs, all emissions from point M0001 are controlled by the boiler/incinerator in incinerator mode (1425 deg F), and M0001 is modelled at the PTE. This condition was written to cap facility emissions of formaldehyde from being subject to part 212.

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The facility must sum formaldehyde emissions from EU 1-SVSAT and EU 1-PAPER each month. The facility must verify emissions remain below 4208 pounds during any 12 month period. The facility shall report on this condition semi annually.

The facility must operate the boiler/incinerator in incineration (1425 deg F) mode at all times that emission unit 1-SVSAT is in operation. This is a deviation from previous VOC RACT variances, though the facility opted to model with 98% control on this stack and therefore must demonstrate as such. This requirement is addressed under other citations.

The facility must monitor actual emissions of all HAPs and VOCs utilized on the three paper machines. The Facility shall maintain 12 month rolling totals of the quantity of each individual HAP and VOC emitted during operation of the paper machines. In support of these emission records, the facility shall maintain records of the HAP and VOC content of each chemical and raw material utilized accurate to 0.1%. Further, records of the monthly quantity of each chemical and raw material must be maintained. If requested the facility will perform a facility wide ambient air quality impact analysis on any HAP or VOC suspected of exceeding the Department's ambient guideline concentrations. The ambient air quality impact analysis procedure and ambient guideline concentrations are outlined in DEC Program Policy DAR-1.

40 CFR 63 JJJJ : Condition 40, 41, 43, 44, 45, 46, 47, 49, 50, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62 :

The facility is subject to multiple requirements of this National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating.

The facility is required to limit organic HAP emissions to no more than 5% organic HAP as applied. The facility will meet these requirements by operating the boiler/incinerator at a minimum temperature of 1425 degrees Fahrenheit whenever this process is in operation. The facility must maintain a quality of data outlined in these conditions that meets the validation requirements of this part. The facility is required to continuously monitor temperature to verify compliance. Temperature is to be included in a site specific monitoring plan to demonstrate compliance. The facility will update this plan annually and will be made available upon request.

The control device used to demonstrate compliance with this part must undergo a destruction or removal efficiency test. The destruction efficiency for this part is required to meet 95% control, though the facility must also maintain this same equipment to 98% control for other requirements.

The facility is required to maintain a permanent total enclosure for the collection of contaminants regulated by this part.

40 CFR NSPS Subpart Dc : Condition 68, 69, 70 : The facility will provide notification of initial startup of the equipment covered by this subpart. The facility will maintain records daily of the types of fuel combusted during each day.

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40 CFR 63 QQQQQ : 75, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88 : This facility operates equipment subject to this National Emission Standards for Hazardous Air Pollutants for Friction Materials Manufacturing Facilities.

The facility will limit emissions of HAP solvents to 30% of which would otherwise be emitted in the absence of solvent recovery. This will be based on a 7 day average monitored daily. This limit does not need to be met during startup shutdown or malfunction,

A startup, shutdown, and malfunction plan must be developed and implemented according to the provisions of 40 CFR 63.6(E)(3). The facility will report any instance od an emission limit was not met, and any deviations that do occur must demonstrate to the administrators satisfaction that the facility was operating in accordance with the startup shutdown and malfunction plan. Any startup, shutdown, or malfunction that took place inconsistent with the startup shutdown and malfunction plan must submit a report of these actions immediately. Otherwise, reporting will be required semiannually. Records must be maintained demonstrating compliance and kept for 5 years.

Condition 5 : 6 NYCRR Part 201-6.4 (c) (3) (ii) : This condition outlines the requirements for semi annual compliance reports. This condition outlines what these reports must include, who must complete the certification, when and where to submit.

Condition 1-1 : 6 NYCRR Part 201-6.4 (e) : This condition outlines the requirements for annual compliance certifications. This condition outlines what these certifications must include, who must complete the certification, when and where to submit.

Condition 1-2 : 6 NYCRR Part 202-2.1 : This condition requires that emission statements annually to the Division of Air and must be submitted prior to April 15 of each year

Condition 1- 46: 6 NYCRR Part 201-6.5 (a) : This condition outlines CLCPA applicability

Condition 1-10 : 6 NYCRR 228-1.3 (a) : This condition requires the that no visible emissions greater than 20 percent be emitted from sources subject to 228. The facility shall conduct daily emissions observations and complete a logbook of these observations.

Condition 1-13 : 6 NYCRR 228-1.3 (d) : Process MIX shall be monitored by restricting the volatilization of solvents in the resin kitchen by maintaining closed vessel lids at all times. The facility must maintain records that verify the position of the vessel lids once during each shift. Further, a logbook shall be maintained of the observations and any corrective actions taken. The facility will report on this condition annually.

Condition 1-14 : 6 NYCRR 228-1.3 (d) : This condition requires work areas associated with a coating line to be monitored for the handling, storage, and disposal of VOC compounds. Should

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a deviation of one of the parameters outlined in this condition be found, an entry must be made in a logbook outlining the deviation and the corrective actions taken. This condition shall be reported upon semi annually.

Condition 1-15 : 6 NYCRR 228-1.6 (h) : This condition requires that any information showing noncompliance with part 228 must be reported to the Department within 30 days after the generation of such record. These records must be maintained for five years.

Condition 35 : 6 NYCRR 228-1.4 (d)(3): The facility is required to report annual coating usage as well as raw material usage of VOC containing raw materials. This information will be presented as a 12 month average reported upon annually.