

**Division of Air Resources
Permit Review Report**

Permit ID: 6-2218-00017/00009

Renewal Number: 3

07/12/2022

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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WATERTOWN, NY 13601

Phone:

Division of Air Resources:

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Air Permitting Contact:

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Address: 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

Application for renewal of Air Title V Facility. This renewal removes Emission Units 1-GENER, 1-AQSAT, and Process WAS. This renewal also includes a VOC RACT determination for the methanol tanks on site.

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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:

Knowlton Technologies LLC is engaged in the production of various types of specialty papers, including automotive filter and friction papers. The primary Standard Industrial Classification representative of this facility is 2621, Paper Mills.

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), solvent storage tanks (Emission Unit 1-TANKS), beater rooms (Emission Unit 1-BTRRM), Wastewater Treatment (1-WWTMP)

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

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(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:

- 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 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 (PAP01 - Inclined Wire Paper Machine), three points for paper machine 2 (PAP02 - Fourdrinier Paper Machine) and one point for the pilot paper machine (PAP03).

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

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 1BTRRM - This emission unit contains equipment in beater room 1 and beater room 2

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

BTR01, BTR02

Process: BR1 This process is for Beater Room #1, which includes a pulper, mix tank, mix dump chest, pulper machine chest and pulp dump chest. Beater Room #1 feeds into paper machine #1

Process: BR2 This process is for Beater Room #2 which includes a hi-lo pulper, #6 chest, #5 chest, and #3 chest. Beater Room #2 feeds into paper machine #2

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

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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.

Emission unit 1TANKS - This emission unit consists of two 10,000 gallon underground tanks used to store methanol. Emissions from both tanks are manifolded together and vent from the same point (TANK1).

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

TANK1

Process: T01 is located at Building TNKFM - This process involves the filling and storage operations for tank1 and tank2.

Emission unit 1WWTMP - This emission unit is the facility's wastewater treatment plant consisting of an equalization tank, polymer addition, dissolved air floatation tank (DAF), clariflocculator and sludge press

Process: WW1 This process is the facility's wastewater treatment plant consisting of an equalization tank, polymer addition, dissolved air floatation tank (DAF), clariflocculator and sludge press.

Title V/Major Source Status

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

The facility has emissions of methanol (a Hazardous Air Pollutant - HAP), phenol (HAP), Total HAP and Volatile Organic Compounds (VOC) above the major source thresholds.

Program Applicability

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

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO

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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.

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

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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
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 Coating Operation
4-02-013-03	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Mixing
4-05-005-97	PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL OTHER NOT CLASSIFIED
4-07-008-14	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - ALCOHOLS Isopropyl Alcohol: Working Loss
5-03-007-02	SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - LIQUID WASTE SOLID WASTE DISPOSAL-INDUSTRIAL-LIQUID WASTE TREATMENT-GENERAL

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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			
000124-38-9	CARBON DIOXIDE	60066450			
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS	30197			
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	
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			
0NY075-02-5	PM 2.5	3950			
0NY075-00-5	PM-10	3949			
000107-13-1	PROPENENITRIL E	108			

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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 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

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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:

- 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 201-6.7 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.

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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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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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

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
-- FACILITY	ECL 19-0301	97	Powers and Duties of the Department with respect to air pollution control
1-SVSAT/-/BLR	40CFR 60-A.12	75	General provisions - Circumvention
1-SVSAT/-/BLR	40CFR 60-A.14	76	General provisions - Modification
1-SVSAT/-/BLR	40CFR 60-A.4	72	General provisions -

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1-SVSAT/-/BLR	40CFR 60-A.7 (a)	73	Address
1-SVSAT/-/BLR	40CFR 60-A.9	74	Notification and Recordkeeping
FACILITY	40CFR 60-Dc.48c (a)	33	General provisions - Availability of information
1-SVSAT/-/BLR	40CFR 60-Dc.48c (g)	77	Reporting and Recordkeeping Requirements.
1-SVSAT/-/BLR	40CFR 60-Dc.48c (i)	78	Reporting and Recordkeeping Requirements.
1-SVSAT	40CFR 63-A	53	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 63- DDDDD.7495 (d)	34	Subpart A - General Provisions apply to all NESHAP affected sources
FACILITY	40CFR 63- DDDDD.7540 (a)	35	ICI Boiler Major Source NESHAP - Notification Requirements
FACILITY	40CFR 63- DDDDD.7550 (b)	36	ICI Boiler Major Source NESHAP - Continuous Compliance
FACILITY	40CFR 63- DDDDD.7550 (c)	37	ICI Boiler Major Source NESHAP - Reporting Requirements
FACILITY	40CFR 63- DDDDD.7550 (d)	38	ICI Boiler Major Source NESHAP - Compliance Reports
FACILITY	40CFR 63- DDDDD.7555 (a)	39	ICI Boiler Major Source NESHAP - Deviation Reporting at Facilities not Using CMS
FACILITY	40CFR 63- DDDDD.7555 (g)	40	ICI Boiler Major Source NESHAP - Recordkeeping
FACILITY	40CFR 63-EEEE.2343	41, 42	ICI Boiler Major Source NESHAP - Gas 1 Recordkeeping
1-SVSAT	40CFR 63- JJJJ.3320 (b) (1)	54	Requirements for emission sources not requiring control
1-SVSAT	40CFR 63-JJJJ.3321 (a)	55	Paper and Other Web Coating NESHAP - Emission Standards - Organic HAP applied
1-SVSAT	40CFR 63-JJJJ.3330 (a)	56	Paper and Other Web Coating NESHAP - Operating limits
1-SVSAT	40CFR 63-JJJJ.3350 (e)	57, 58	Compliance date for existing affected sources.
1-SVSAT	40CFR 63-JJJJ.3350 (f)	59	Paper and Other Web Coating NESHAP - monitoring for a non-catalytic oxidizer
			Paper and Other Web Coating NESHAP - Monitoring of capture systems

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1-SVSAT	40CFR 63-JJJJ.3360 (e) (2)	62	Recording of process information during performance test.
1-SVSAT	40CFR 63-JJJJ.3360 (e) (3)	63	Control device operating limits.
FACILITY	40CFR 63-JJJJ.3370 (a) (5)	43	Paper and Other Web Coating NESHAP - Compliance with capture and control systems
1-SVSAT	40CFR 63-JJJJ.3370 (1) (1)	64	Paper and Other Web Coating NESHAP - compliance with capture and control device efficiency.
1-SVSAT	40CFR 63-JJJJ.3370 (1) (2)	65	Paper and Other Web Coating NESHAP - Calculation of HAP control efficiency
1-SVSAT	40CFR 63-JJJJ.3370 (1) (3)	66	Paper and Other Web Coating NESHAP - Oxidizer compliance
1-SVSAT	40CFR 63-JJJJ.3400 (c)	67	Paper and Other Web Coating NESHAP - reporting - semiannual compliance report
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1-SVSAT	40CFR 63-JJJJ.3400 (f)	70	Paper and Other Web Coating NESHAP - reporting - Performance test reports
1-SVSAT	40CFR 63-JJJJ.3410	71	Paper and Other Web Coating NESHAP - Recordkeeping requirements
1-SVSAT/-/MIX	40CFR 63-QQQQ.9500 (a)	82	Friction Materials Manufacturing - Emission Limitations for large solvent mixers
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1-SVSAT/-/MIX	40CFR 63- QQQQQ.9505 (c)	85	Friction Materials Manufacturing - General Compliance Requirements
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1-SVSAT/-/MIX	40CFR 63- QQQQQ.9530 (c)	87	Friction Materials Manufacturing - deviations
1-SVSAT/-/MIX	40CFR 63- QQQQQ.9530 (e)	88	Friction Materials Manufacturing - deviations during startup, shutdown, and malfunction
1-SVSAT/-/MIX	40CFR 63-QQQQQ.9535	89	Friction Materials Manufacturing - Notification requirements.
1-SVSAT/-/MIX	40CFR 63-QQQQQ.9540	90	Friction Materials Manufacturing - Semiannual Reports
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1-SVSAT/-/MIX	40CFR 63-QQQQQ.9570	94	Friction Materials Manufacturing - Alternative compliance requirements.
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FACILITY	6NYCRR 201-6.4 (a) (7)	3	General Conditions - Requirement to Provide Information
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FACILITY	6NYCRR 202-2.1	8	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.4 (a) (3)	1	Emission statement methods and procedures
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FACILITY	6NYCRR 211.2	26	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.6 (a)	27	Limiting of Opacity
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FACILITY	6NYCRR 215.2	10	Orange Co and NYC Metro area
1-SVSAT	6NYCRR 227-1.3 (c)	48	Open Fires - Prohibitions
1-SVSAT FACILITY	6NYCRR 227-1.4 (a)	49	Annual Tune-up Requirement
FACILITY	6NYCRR 228-1.1 (a) (3)	30	Opacity Standard
FACILITY	6NYCRR 228-1.3 (b)	31	Once in always in Surface Coating
1-SVSAT/-/INK	6NYCRR 228-1.3 (b) (1)	79	General Requirements-Recordkeeping
1-SVSAT/-/SS1	6NYCRR 228-1.3 (b) (1)	95	General Requirements - Record Keeping
1-SVSAT/-/INK	6NYCRR 228-1.3 (c)	80	General Requirements - Record Keeping
1-SVSAT/-/SS1	6NYCRR 228-1.3 (c)	96	Surface Coating
1-SVSAT/-/INK	6NYCRR 228-1.3 (d)	81	General Requirements- Prohibitions
FACILITY	6NYCRR 228-1.3 (e) (2)	32	Surface Coating
1-SVSAT	6NYCRR 228-1.5 (b)	50, 51, 52	General Requirements- Handling, storage and disposal
			Use of 55 gallons of non-compliant coating
			Natural gas incineration of VOCs

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

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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 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.

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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 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 202-2.5

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 their 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

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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.

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.

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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.

40 CFR 63.2343

This citation states the requirements for emission sources subject to Subpart EEEE but not requiring control.

40 CFR 63.3320 (b) (1)

This citation states the organic HAP percent reduction requirement for affected sources.

40 CFR 63.3321 (a)

This citation states the operating requirements for web coating lines which use add on control devices.

40 CFR 63.3330 (a)

This citation states the compliance dates for existing sources.

40 CFR 63.3350 (e)

This citation states the requirement for continuous parameter monitoring systems.

40 CFR 63.3350 (f)

This citation states the requirements for capture system monitoring.

40 CFR 63.3360 (e)

This citation states the requirement to conduct a performance test to determine control

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device efficiency.

40 CFR 63.3360 (e) (1)

This citation states the requirement to conduct an initial performance test to determine control device efficiency.

40 CFR 63.3360 (e) (2)

This citation states the requirement to record process information during performance tests.

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

This citation states the procedures to establish operating limits for thermal oxidizers.

40 CFR 63.3370 (a) (5)

This citation states the requirements for facilities demonstrating compliance with Subpart JJJJ by using a capture system and control device.

40 CFR 63.3370 (l) (1)

This citation states the procedures for demonstrating compliance with capture and control device efficiency limits.

40 CFR 63.3370 (l) (2) (i)

This citation states the method to determine overall control efficiency.

40 CFR 63.3370 (l) (3) (i)

This citation states the temperature and HAP emission restrictions for facilities using an oxidizer.

40 CFR 63.3400 (c)

This citation states the requirements for semiannual compliance reports.

40 CFR 63.3400 (d)

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This citation states the requirements for notification of performance test reports.

40 CFR 63.3400 (e)

This citation states the requirements for notification of compliance status reports.

40 CFR 63.3400 (f)

This citation states the requirements for performance test reports.

40 CFR 63.3410

This citation states the recordkeeping requirements for Subpart JJJJ.

40 CFR 63.7495 (d)

This condition states the notification requirements of the boiler MACT.

40 CFR 63.7540 (a)

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

40 CFR 63.7550 (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

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40 CFR 63.7555 (g)

This condition states the recordkeeping requirements for the gas 1 subcategory

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 states the notification requirements for Subpart QQQQ.

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 states the procedures for applying for alternative compliance requirements.

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.

6 NYCRR 201-6.4 (f)

This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 201-6.4 (f) (2)

This section describes the requirements for operational flexibility protocols included in Title V permits. The facility owner or operator may make certain changes to the facility that have been reviewed and approved pursuant to the protocol without first obtaining a permit modification for those changes.

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6 NYCRR 201-6.5 (a)

This subdivision states that the Department shall include state enforceable conditions in Title V permits. State enforceable conditions related to regulations developed pursuant to the Climate Leadership and Community Protection Act (CLCPA) and Article 75 of New York State Environmental Conservation Law may be included in future versions of this permit, as applicable.

6 NYCRR 202-2.4 (a) (3)

Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the following schedule beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued:

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

6 NYCRR 211.1

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

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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)

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 212-3.1 (a) (2)

This provision states that owners and/or operators of facilities located outside of the the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury or New York City metropolitan area with an annual potential to emit of 100 tons or more of NOx or 50 tons or more of VOCs must comply with the requirements of this section.

6 NYCRR 227-1.3 (c)

This subdivision requires that all stationary combustion installations subject to this subpart perform an annual tune-up.

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6 NYCRR 227-1.4 (a)

This subdivision sets the opacity standard for subject stationary combustion installations.

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 (b)

The owner or operator of any emission source subject to this Subpart must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.

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.

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.

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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 228-1.5 (b)

This section specifies the operating requirements for thermal oxidizers operated to comply with the requirements of 6 NYCRR Subpart 228-1.

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

Compliance Certification

Summary of monitoring activities at KNOWLTON TECHNOLOGIES LLC:

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

FACILITY	33	record keeping/maintenance procedures
1-SVSAT/-/BLR	77	record keeping/maintenance procedures
1-SVSAT/-/BLR	78	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
1-SVSAT	54	record keeping/maintenance procedures
1-SVSAT	55	record keeping/maintenance procedures
1-SVSAT	57	monitoring of process or control device parameters as surrogate
1-SVSAT	58	monitoring of process or control device parameters as surrogate
1-SVSAT	59	record keeping/maintenance procedures
1-SVSAT	60	record keeping/maintenance procedures
1-SVSAT	61	intermittent emission testing
1-SVSAT	63	monitoring of process or control device parameters as surrogate
FACILITY	43	record keeping/maintenance procedures
1-SVSAT	64	record keeping/maintenance procedures
1-SVSAT	65	record keeping/maintenance procedures
1-SVSAT	66	record keeping/maintenance procedures

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1-SVSAT	67	record keeping/maintenance procedures
1-SVSAT	68	record keeping/maintenance procedures
1-SVSAT	69	record keeping/maintenance procedures
1-SVSAT	70	record keeping/maintenance procedures
1-SVSAT	71	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	intermittent emission testing
1-SVSAT/-/MIX	87	record keeping/maintenance procedures
1-SVSAT/-/MIX	88	record keeping/maintenance procedures
1-SVSAT/-/MIX	89	record keeping/maintenance procedures
1-SVSAT/-/MIX	90	record keeping/maintenance procedures
1-SVSAT/-/MIX	91	record keeping/maintenance procedures
1-SVSAT/-/MIX	92	record keeping/maintenance procedures
1-SVSAT/-/MIX	93	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
1-SVSAT	47	work practice involving specific operations
FACILITY	8	record keeping/maintenance procedures
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	101	record keeping/maintenance procedures
FACILITY	102	work practice involving specific operations
FACILITY	103	work practice involving specific operations
FACILITY	104	monitoring of process or control device parameters as surrogate
FACILITY	28	intermittent emission testing
FACILITY	29	work practice involving specific operations
1-SVSAT	48	record keeping/maintenance procedures
1-SVSAT	49	monitoring of process or control device parameters as surrogate
FACILITY	31	record keeping/maintenance procedures
1-SVSAT/-/INK	79	record keeping/maintenance procedures
1-SVSAT/-/SS1	95	record keeping/maintenance procedures
1-SVSAT/-/INK	81	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
1-SVSAT	50	monitoring of process or control device parameters as surrogate
1-SVSAT	51	monitoring of process or control device parameters as surrogate
1-SVSAT	52	monitoring of process or control device parameters as surrogate

Basis for Monitoring

PRR Monitoring Requirements

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

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.

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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.

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

6 NYCRR Part 201-6.4(f)(2) – This condition provides the operational flexibility protocol for the facility. This condition enables the facility to make certain changes without modifying the facility permit.

6 NYCRR Part 212-3 : 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. Variances must be reevaluated each renewal term. This RACT has been submitted to the USEPA for incorporation in the SIP.

6 NYCRR Part 212 : This permit includes several monitoring conditions for this part. 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 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. 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

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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.

6 NYCRR 225-1.2 (d) : The owners/operators of an emission source that fires distillate oil are limited to 0.0015 percent by weight sulfur content in fuel. Compliance will be demonstrated with fuel vendor receipts.

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.

6 NYCRR 228-1.3 (b): The owner or operator of an emission source subject to this subpart must provide upon request certification from the coating supplier which lists actual VOC content and parameters utilized to determine actual VOC. Further, purchase and usage records of each coating material must be maintained.

6 NYCRR 228-1.3 (d) : The facility operations 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.

6 NYCRR 228-1.3 (e) (2): A facility containing a coating line may use up to 55 gallons of coatings on a 12 month rolling total basis which does not comply with the VOC content limits set forth in section 228-1.4.

40 CFR 63 DDDDD : The facility must demonstrate compliance with the requirements for Other Gas 1 fuel. 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.

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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. 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 : 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 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 JJJJ :

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 emission unit 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

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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.

6 NYCRR 201-7 : The facility has accepted a cap on emission unit 1-SVSAT. Emissions of volatile organic compounds are limited to 36 tons per year. The facility shall maintain records that quantify the amount of each coating and ink applied, the VOC content of each coating and ink as applied, the quantity and VOC content of all solvents utilized in the mix tanks. Further records of the latest emissions test showing capture and control efficiency attained on the emission unit will be maintained. Emissions will be rolled monthly to produce a 12 month total.

6 NYCRR 227-1 : The facility is required to conduct an annual tuneup of the boiler on site and annual method 9 opacity reading. Records of these activities should be maintained on site for a period of five years and reported upon annually.

6 NYCRR 228-1.5(b) : 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 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.

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40 CFR NSPS Subpart Dc : The facility will maintain records daily of the types of fuel combusted during each day.

6 NYCRR 228-1.3 (b) : This condition requires the emission source to maintain a number of records. Records should include a certification from the coating supplier listing the method to determine actual VOC content of each as applied coating, purchase and usage records, records of each air cleaning device with removal efficiency of 90%, and records verifying each parameter used to calculate the overall removal efficiency.

40 CFR 63 QQQQQ : 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 of an emission limit that 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.