



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 8-2614-00117/00038**

**Renewal Number: 2**

**09/14/2012**

**Facility Identification Data**

Name: AMERICAN PACKAGING CORP

Address: 777 DRIVING PARK AVE

ROCHESTER, NY 14613

**Owner/Firm**

Name: AMERICAN PACKAGING CORP

Address: 777 DRIVING PARK AVE

ROCHESTER, NY 14613-1541, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

Name: ROGER T MCDONOUGH

Address: 6274 EAST AVON LIMA RD

AVON, NY 14414-9519

Phone:5852262466

Division of Air Resources:

Name: YUAN ZENG

Address: NYSDEC REGION 8 HQ

6274 E AVON - LIMA RD

AVON, NY 14414-9519

Phone:5852262466

Air Permitting Contact:

Name: DAVE GEIER

Address: AMERICAN PACKAGING CORP

777 DRIVING PARK AVE

ROCHESTER, NY 14613

Phone:5852549500

**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.

**Attainment Status**

AMERICAN PACKAGING CORP is located in the town of ROCHESTER in the county of MONROE.



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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.)

| <b>Criteria Pollutant</b>                   | <b>Attainment Status</b>          |
|---|-----------------------------------|
| Particulate Matter (PM)                     | ATTAINMENT                        |
| Particulate Matter < 10µ in diameter (PM10) | ATTAINMENT                        |
| Sulfur Dioxide (SO2)                        | ATTAINMENT                        |
| Ozone*                                      | TRANSPORT REGION (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:**

AMERICAN PACKAGING CORPORATION OPERATES THEIR EXTRUSION LAMINATING AND COATING DIVISION IN ROCHESTER, NEW YORK. THIS FACILITY OPERATES TWO EXTRUSION LAMINATORS, ONE W&H FLEXOGRAPHIC PRESS, ONE WOLVERINE 2-COLOR PRESS, AND SEVERAL PROCESS SUPPORT FACILITIES, INCLUDING A LABORATORY, CHEMICAL STORAGE AREAS, SPACE HEATING EQUIPMENT AND OTHER MISCELLANEOUS PROCESSES.

**Permit Structure and Description of Operations**

The Title V permit for AMERICAN PACKAGING CORP 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:

- 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.

AMERICAN PACKAGING CORP is defined by the following emission unit(s):



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Emission unit A00002 - FLEXOGRAPHIC AND PACKAGING ROTOGRAVURE PRINTING AND COATING WITH OZONE TREATER.

Emission unit A00002 is associated with the following emission points (EP):  
00007, 00008

Process: FLS is located at FIRST, Building MAIN - FLEXOGRAPHIC AND ROTOGRAVURE PRINTING AND COATING USING SOLVENT BASED INKS.

Process: FLW is located at FIRST, Building MAIN - FLEXOGRAPHIC AND ROTOGRAVURE PRINTING AND COATING USING WATER BASED INKS.

Process: OZ1 PAPER AND FILM ARE TREATED WITH HIGH VOLTAGE ELECTRICITY IN THE OZONE TREATER. FLEXO HAS ONE 15KW OZONE TREATER THAT EXHAUSTS THROUGH THE EXISTING EMISISON POINTS# 00007 OR 00008.

Emission unit A00003 - EXTRUDERS AND OZONE TREATERS - PRINTING OPERATIONS.

Emission unit A00003 is associated with the following emission points (EP):  
00032, 00033, 00034, 00035, 00036

Process: EX2 Paper and plastic film are coated using solvent-based extruded primers and Melted/extruded polyethylene resins.

Process: OZ2 Paper and film are treated with high voltage electricity in the ozone treaters.

Emission unit A00001 - EXTRUDERS AND OZONE TREATERS - PRINTING OPERATIONS.

Emission unit A00001 is associated with the following emission points (EP):  
00004, 00005, 00009, 00010, 00011, 00020, 00021, 00030, 00031, THOX1

Process: EXT is located at FIRST, Building MAIN - PAPER AND PLASTIC FILM ARE COATED USING SOLVENT-BASED EXTRUDER PRIMERS AND MELTED/EXTRUDED POLYETHYLENE RESINS.

Process: GWP is located at Building MAIN - GRAVURE AND WOLVERINE (BELOIT) IN-LINE PRINTING OPERATIONS WITH WATER BASED INKS.

Process: OZO is located at FIRST, Building MAIN - PAPER AND FILM ARE TREATED WITH HIGH VOLTAGE ELECTRICITY IN THE OZONE TREATERS. WHEN USED ON BELOIT OZONATOR EXHAUSTES THROUGH THE EXISTING EMISISON POINT #00005. WHEN USED ON BCT EXHAUSTS THROUGH EP#00011.



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AMERICAN PACKAGING CORP is subject to Title V requirements. This determination is based on the following information:

American Packaging meets the definition of a Major Source in 6NYCRR Part 201-2.1(b)(21) due to potential emissions of VOC in excess of 50 tons per year.

**Program Applicability**

The following chart summarizes the applicability of AMERICAN PACKAGING CORP 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                           | NO            |
| TITLE IV                       | NO            |
| TITLE V                        | YES           |
| TITLE VI                       | NO            |
| RACT                           | YES           |
| SIP                            | YES           |

**NOTES:**

**PSD** Prevention of Significant Deterioration (40 CFR 52) - 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 Part 231) - 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) - 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) - 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.



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**NSPS** New Source Performance Standards (40 CFR 60) - 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)** - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

**Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G)** - 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 212.10, 226, 227-2, 228, 229, 230, 232, 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) - 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**

2671  
2672

PAPER COATED AND LAMINATED PACKAGING  
PAPER COATED AND LAMINATED, NEC

**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.

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| SCC Code    | Description   |
|-------------|---|
| 4-02-013-01 | SURFACE COATING OPERATIONS<br>SURFACE COATING OPERATIONS - PAPER COATING<br>Coating Operation         |
| 4-02-999-97 | SURFACE COATING OPERATIONS<br>SURFACE COATING OPERATIONS - MISCELLANEOUS<br>Specify in Comments Field |
| 4-05-003-11 | PRINTING/PUBLISHING<br>PRINTING/PUBLISHING - GENERAL  |
| 4-05-005-01 | PRINTING - FLOXOGRAPHIC<br>PRINTING/PUBLISHING<br>PRINTING/PUBLISHING - GENERAL<br>Gravure - 2754     |

**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 Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). 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 Name   | PTE    |                             |
|-------------|--------------------|--------|-----------------------------|
|             |                    | lbs/yr | Range                       |
| 007664-41-7 | AMMONIA            |        | >= 2.5 tpy but < 10 tpy     |
| 000630-08-0 | CARBON MONOXIDE    |        | > 0 but < 2.5 tpy           |
| 0NY100-00-0 | HAP                |        | >= 2.5 tpy but < 10 tpy     |
| 007439-92-1 | LEAD               |        | > 0 but < 10 tpy            |
| 000067-56-1 | METHYL ALCOHOL     |        | > 0 but < 10 tpy            |
| 0NY210-00-0 | OXIDES OF NITROGEN |        | >= 2.5 tpy but < 10 tpy     |
| 010028-15-6 | OZONE              |        | >= 2.5 tpy but < 10 tpy     |
| 0NY075-00-0 | PARTICULATES       |        | > 0 but < 2.5 tpy           |
| 0NY075-00-5 | PM-10              |        | > 0 but < 2.5 tpy           |
| 007446-09-5 | SULFUR DIOXIDE     |        | > 0 but < 2.5 tpy           |
| 0NY998-00-0 | VOC                |        | >= 250 tpy but < 75,000 tpy |

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**



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

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

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

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

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

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

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

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

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

**Item B: 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 C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.3(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 D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(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 E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(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 F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and**



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**Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(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 G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(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 H: Property Rights - 6 NYCRR 201-6.5(a)(6)**

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

**Item I: Severability - 6 NYCRR Part 201-6.5(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 J: Permit Shield - 6 NYCRR Part 201-6.5(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 K: Reopening for Cause - 6 NYCRR Part 201-6.5(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 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.
- 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 L: 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 M: 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**

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**Item A: 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**

| <b>Location<br/>Facility/EU/EP/Process/ES</b> | <b>Regulation</b>       | <b>Condition</b> | <b>Short Description</b>   |
|---|-------------------------|------------------|--|
| --<br>FACILITY                                | ECL 19-0301             | 80               | Powers and Duties of the Department with respect to air pollution control  |
| FACILITY                                      | 40CFR 63-A.10 (b) (3)   | 51               | Printing and Publishing NESHAP-Reporting requirements  |
| FACILITY                                      | 40CFR 63-KK.830 (b) (1) | 52               |  |
| FACILITY                                      | 40CFR 63-ZZZZ.6603 (a)  | 53               | Reciprocating Internal Combustion Engine (RICE) NESHAP - requirements for existing engines at area sources of HAP emissions  |
| FACILITY                                      | 40CFR 63-ZZZZ.6605 (a)  | 54               | Reciprocating Internal Combustion Engine (RICE) NESHAP - compliance  |
| FACILITY                                      | 40CFR 63-ZZZZ.6605 (b)  | 55               | Reciprocating Internal Combustion Engine (RICE) NESHAP - operate and maintain air pollution control and monitoring equipment |
| FACILITY                                      | 40CFR 63-ZZZZ.6625 (e)  | 56               | Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance of engine and control device                            |
| FACILITY                                      | 40CFR 63-ZZZZ.6625 (f)  | 57               | Reciprocating  |

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|          |                        |    |   |
|----------|------------------------|----|---|
|          |                        |    | Internal Combustion Engine (RICE) NESHAP - non-resettable hour meter for certain existing emergency engines |
| FACILITY | 40CFR 63-ZZZZ.6625 (h) | 58 | Reciprocating Internal Combustion Engine (RICE) NESHAP - idling time at startup                             |
| FACILITY | 40CFR 63-ZZZZ.6625 (j) | 59 | Reciprocating Internal Combustion Engine (RICE) NESHAP - oil analysis program for spark ignition engines    |
| FACILITY | 40CFR 63-ZZZZ.6640 (a) | 60 | Reciprocating Internal Combustion Engine (RICE) NESHAP - Compliance Requirements                            |
| FACILITY | 40CFR 63-ZZZZ.6640 (b) | 61 | Reciprocating Internal Combustion Engine (RICE) NESHAP - deviations and catalyst changing                   |
| FACILITY | 40CFR 63-ZZZZ.6655 (a) | 62 | Reciprocating Internal Combustion Engine (RICE) NESHAP - records that must be kept                          |
| FACILITY | 40CFR 63-ZZZZ.6655 (b) | 63 | Reciprocating Internal Combustion Engine (RICE) NESHAP - records that must be kept for CEMS and CPMS        |
| FACILITY | 40CFR 63-ZZZZ.6655 (d) | 64 | Reciprocating Internal Combustion Engine (RICE) NESHAP - Record keeping requirements                        |
| FACILITY | 40CFR 63-ZZZZ.6655 (e) | 65 | Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance plan records that must be kept         |
| FACILITY | 40CFR 63-ZZZZ.6655 (f) | 66 | Reciprocating Internal Combustion Engine (RICE) NESHAP - Recordkeeping requirements                         |
| FACILITY | 40CFR 63-ZZZZ.6665     | 67 | Reciprocating Internal Combustion Engine (RICE) NESHAP - General provisions                                 |
| FACILITY | 40CFR 68               | 22 | Chemical accident prevention provisions   |
| FACILITY | 40CFR 82-F             | 23 | Protection of Stratospheric Ozone - recycling and emissions reduction                                       |

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|----------|-----------------------------|------------|--|
| FACILITY | 6NYCRR 200.6                | 1          | Acceptable ambient air quality.  |
| FACILITY | 6NYCRR 200.7                | 10         | Maintenance of equipment.  |
| FACILITY | 6NYCRR 201-1.4              | 81, 82     | Unavoidable noncompliance and violations   |
| FACILITY | 6NYCRR 201-1.7              | 11         | Recycling and Salvage  |
| FACILITY | 6NYCRR 201-1.8              | 12, 13     | Prohibition of reintroduction of collected contaminants to the air                 |
| FACILITY | 6NYCRR 201-3.2 (a)          | 14         | Exempt Activities - Proof of eligibility   |
| FACILITY | 6NYCRR 201-3.3 (a)          | 15         | Trivial Activities - proof of eligibility  |
| FACILITY | 6NYCRR 201-6                | 24, 68, 69 | Title V Permits and the Associated Permit Conditions                               |
| FACILITY | 6NYCRR 201-6.5 (a) (4)      | 16         | General conditions   |
| FACILITY | 6NYCRR 201-6.5 (a) (7)      | 2          | General conditions   |
| FACILITY | 6NYCRR 201-6.5 (a) (8)      | 17         | Fees   |
| FACILITY | 6NYCRR 201-6.5 (c)          | 3          | General conditions   |
|          |                             |            | Permit conditions for Recordkeeping and Reporting of Compliance Monitoring         |
| FACILITY | 6NYCRR 201-6.5 (c) (2)      | 4          | Permit conditions for Recordkeeping and Reporting of Compliance Monitoring         |
| FACILITY | 6NYCRR 201-6.5 (c) (3) (ii) | 5          | Permit conditions for Recordkeeping and Reporting of Compliance Monitoring         |
| FACILITY | 6NYCRR 201-6.5 (d) (5)      | 18         | Compliance schedules   |
| FACILITY | 6NYCRR 201-6.5 (e)          | 6          | Compliance Certification   |
| FACILITY | 6NYCRR 201-6.5 (f)          | 25, 26     | Operational flexibility  |
| FACILITY | 6NYCRR 201-6.5 (f) (6)      | 19         | Off Permit Changes   |
| FACILITY | 6NYCRR 201-7                | 70         | Federally Enforceable Emissions Caps   |
| A-00003  | 6NYCRR 201-7                | 78         | Federally Enforceable Emissions Caps   |
| FACILITY | 6NYCRR 202-1.1              | 20, 21     | Required emissions tests.  |
| FACILITY | 6NYCRR 202-2.1              | 7          | Emission Statements - Applicability  |
| FACILITY | 6NYCRR 202-2.5              | 8          | Emission Statements - record keeping requirements.                                 |
| FACILITY | 6NYCRR 211.1                | 27         | General Prohibitions - air pollution prohibited                                    |
| FACILITY | 6NYCRR 212.4 (a)            | 83         | General Process Emission Sources - emissions from new sources and/or modifications |
| FACILITY | 6NYCRR 215.2                | 9          | Open Fires - Prohibitions  |
| FACILITY | 6NYCRR 228-1.10             | 43         | Handling, storage and  |



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|---------------------|--------------------------|--------|--|
| A-00001             | 6NYCRR 228-1.3 (a)       | 71     | disposal of VOCs<br>Recordkeeping,<br>reports for VOCs                       |
| A-00001/-/EXT/BCTEX | 6NYCRR 228-1.3 (a)       | 72, 73 | Recordkeeping,<br>reports for VOCs   |
| A-00003/-/EX2       | 6NYCRR 228-1.3 (a)       | 79     | Recordkeeping,<br>reports for VOCs   |
| FACILITY            | 6NYCRR 228-1.3 (b)       | 28     | VOC incinerator- 80%<br>overall removal<br>efficiency                        |
| FACILITY            | 6NYCRR 228-1.3 (d)       | 29     | Coating system as a<br>control strategy                                      |
| A-00002/-/FLS       | 6NYCRR 228-1.3 (e) (1)   | 74, 75 | Lesser degree of<br>control  |
| FACILITY            | 6NYCRR 228-1.4           | 30     | Opacity  |
| FACILITY            | 6NYCRR 228-1.5 (a)       | 31     | VOC recordkeeping by<br>the facility   |
| FACILITY            | 6NYCRR 228-1.5 (b)       | 32     | Use of Methods 311 or<br>24.   |
| FACILITY            | 6NYCRR 228-1.5 (c)       | 33     | Alternate sampling and<br>analysis methods                                   |
| FACILITY            | 6NYCRR 228-1.5 (d)       | 34     | Department Access to<br>Obtain Samples                                       |
| FACILITY            | 6NYCRR 228-1.5 (e) (2)   | 35     | Demonstration of<br>other than VOC<br>solvent recovery                       |
| FACILITY            | 6NYCRR 228-1.5 (f)       | 36     | Testing and<br>monitoring; Methods<br>18, 25 and 25A                         |
| FACILITY            | 6NYCRR 228-1.5 (i)       | 37     | Records of ED<br>calculation   |
| FACILITY            | 6NYCRR 228-1.5 (j)       | 38     | Record of<br>noncompliance   |
| FACILITY            | 6NYCRR 228-1.5 (k)       | 39     | Records maintained<br>for five years   |
| FACILITY            | 6NYCRR 228-1.6           | 40     | Prohibition of sale  |
| FACILITY            | 6NYCRR 228-1.7           | 41, 42 | Table 1  |
| A-00003             | 6NYCRR 231-2             | 78     | New Source Review in<br>Nonattainment Areas<br>and Ozone Transport<br>Region |
| FACILITY            | 6NYCRR 234.3 (a) (1) (i) | 44     | Control requirements<br>- Ink  |
| A-00002/-/FLS       | 6NYCRR 234.3 (f)         | 76, 77 | Control requirements<br>- RACT demonstration                                 |
| FACILITY            | 6NYCRR 234.4 (b)         | 45     | Testing and<br>monitoring - test<br>methods                                  |
| FACILITY            | 6NYCRR 234.5 (a)         | 46     | Prohibition of sale<br>or specification                                      |
| FACILITY            | 6NYCRR 234.6             | 47     | Handling, storage and<br>disposal of VOCs                                    |
| FACILITY            | 6NYCRR 234.7 (a)         | 48     | Recordkeeping<br>requirements  |
| FACILITY            | 6NYCRR 234.7 (b)         | 49     | Recordkeeping<br>requirements  |
| FACILITY            | 6NYCRR 234.8             | 50     | Opacity  |

**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



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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 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 201-6.5 (a) (4)

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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 201-6.5 (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 201-6.5 (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 201-6.5 (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 201-6.5 (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 201-6.5 (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 201-6.5 (d) (5)

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 201-6.5 (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 201-6.5 (f) (6)

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



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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 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, AMERICAN PACKAGING CORP has been determined to be subject to the following regulations:

40 CFR 63.10 (b) (3)

Determinations that a source is not subject to a relevant standard (for example because it is an area source and the rule only covers major sources) must be kept for 5 years.

40 CFR 63.6603 (a)

These conditions list the emission limits, operating limits, and work practices that existing engines located at an area source of HAP emissions must meet.

The engines must meet work practices, emission limits, and operating limits on carbon monoxide or formaldehyde for the specific type of engine listed in table 2d of subpart ZZZZ.





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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.

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 63.6625 (j)

This condition allows spark ignition engines subject to work practices to extend the length of time between oil changes.

40 CFR 63.6640 (a)

This condition reduces the emissions of hazardous air pollutants from reciprocating internal



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combustion engines (RICE) by listing what the facility has to do to prove that it is continuously meeting the emission limits listed in this rule.

When the facility conducted the performance test to measure the emissions of pollutants during normal engine operation, the facility had to either install a device to continuously measure these emissions or measure parameters which are representative of what the emissions would be during operation of the engine. Then this information must be submitted to the NYSDEC so that DEC can tell from the compliance reports whether the emission limits are being met.

40 CFR 63.6640 (b)

This condition specifies what the facility needs to do in the event that the results of the monitoring show that the facility was not meeting the emission limits in this rule. This is called a deviation from the emission limits and/or operating limits of this rule and must be reported to NYSDEC.

This condition also requires the facility to conduct another performance test and re-establish the operating parameters if the catalyst in the control device is changed.

40 CFR 63.6655 (a)

This regulation sets forth the record keeping requirements for owners or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 63.6655 (b)

This regulation sets forth the record keeping requirements for each continuous emission monitor or continuous parameter monitoring system for stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 63.6655 (d)

Records showing continuous compliance with each applicable emission or operating limit must be kept in accordance with Table 6 of 40 CFR63 Subpart ZZZZ ("Continuous Compliance With Emission Limitations, Operating Limitations, Work Practices, and Management Practices") .

40 CFR 63.6655 (e)

This regulation sets forth the record keeping requirements for RICE subject to facility specific maintenance plans.



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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 63.6665

This regulation specifies which provisions of the General provisions (Subpart A of 40 CFR 63) apply to the owner or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 63.830 (b) (1)

This regulation requires that each owner or operator of an affected source subject to this subpart shall submit the reports specified below to the Administrator:

An initial notification required in § 63.9(b).

(i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in § 63.826(a).

(ii) Initial notifications for new and reconstructed sources shall be submitted as required by § 63.9(b).

(iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under § 63.9(b), provided the same information is contained in the permit application as required by § 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(iv) Permit applications shall be submitted by the same due dates as those specified for the initial notification.

6 NYCRR 201-6.5 (f)

This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

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 212.4 (a)



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This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6 NYCRR 228-1.10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6 NYCRR 228-1.3 (a)

This citation prohibits the use of coatings that exceed the maximum permitted pounds of volatile organic compounds per gallon, unless a coating system meeting certain requirements is used.

6 NYCRR 228-1.3 (b)

This citation requires any volatile organic compound (VOC) incinerator, used as control equipment, to be designed and operated to provide a minimum of 80 percent overall removal efficiency. It also allows an owner or operator of a facility which uses a natural gas fired VOC incinerator as a control device, to shut down the VOC incinerator from November 1st through March 31st for the purposes of natural gas conservation, provided the Department has determined that this action will not jeopardize air quality.

6 NYCRR 228-1.3 (d)

This citation requires an owner or operator of a coating line which utilizes a coating system as a control strategy (which may also employ a control device) to comply with specified requirements for computing efficiency and for Department approval.

6 NYCRR 228-1.3 (e) (1)

This citation specifies the requirements for process specific RACT demonstrations.

6 NYCRR 228-1.4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6 NYCRR 228-1.5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacture which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228, to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.



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6 NYCRR 228-1.5 (b)

This citation requires the owner and operator of any emission source subject to Part 228 to, upon request by the Department, use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, to measure the volatile content, water content, density, volume of solids and weight of solids in order to determine the actual VOC content of an applied coating during a compliance demonstration.

6 NYCRR 228-1.5 (c)

This citation allows alternate sampling and analysis methods to be used, subject to the approval of the Department and the Administrator.

6 NYCRR 228-1.5 (d)

This citation allows representatives of the Department to obtain coating samples during reasonable business hours, for the purpose of determining compliance.

6 NYCRR 228-1.5 (e) (2)

This citation specifies how to evaluate control equipment other than volatile organic compound (VOC)/ solvent recovery systems, and the methods to determine removal efficiency.

6 NYCRR 228-1.5 (f)

This citation specifies testing requirements for a surface coating process.

6 NYCRR 228-1.5 (i)

This requires the owner or operator of a coating system that requires an emission differential (ED) computation, to record the following: the name or identification of each coating; the coating parameters used to compute the ED, the individual ED values for each coating, and the ED value calculated for the coating system; and make the records available to the Department upon request.

6 NYCRR 228-1.5 (j)

This citation requires any information or record showing noncompliance with the requirements of Part 228 to be reported to Department within 30 days of generation of the information or record..

6 NYCRR 228-1.5 (k)

This requires all records required by this regulation to be maintained at the facility for a period of five years



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6 NYCRR 228-1.6

This prohibits the selling, specifying, or requiring for use, coatings at a facility with a regulated coating line if such use is prohibited by any of the provisions of Part 228. The prohibition applies to all written or oral contracts under the terms of which any coating is to be used at an affected facility.

6 NYCRR 228-1.7

Table 1 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6 NYCRR 234.3 (a) (1) (i)

For packaging rotogravure, publication rotogravure or flexographic printing processes that use ink, coating or adhesive containing VOC must use inks that have a VOC content of 0.8 kilograms of VOC per kilogram of solids as applied or 0.16 kilograms of VOC per kilogram of ink, coating or adhesive as applied.

6 NYCRR 234.3 (f)

This regulation sets forth the requirements for a RACT demonstration for printing processes that have a lesser degree of control than that specified in Part 234.3.

6 NYCRR 234.4 (b)

This regulation sets forth the testing methods and procedures to be used for facilities subject to the requirements of Part 234.

6 NYCRR 234.5 (a)

This regulation states that a person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity is prohibited by any of the provisions of this Part.

6 NYCRR 234.6

This regulation specifies the following:

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

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



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- (b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

6 NYCRR 234.7 (a)

This citation specifies the recordkeeping requirements for ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material.

6 NYCRR 234.7 (b)

This citation requires that compliance analysis results be provided to the Department. The Department shall be permitted to obtain samples for compliance determination.

6 NYCRR 234.8

This regulation requires that emissions from a unit subject to Part 234 shall not have an opacity greater than 10%.

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

6 NYCRR Subpart 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

**Compliance Certification**

**Summary of monitoring activities at AMERICAN PACKAGING CORP:**

| Location<br>Facility/EU/EP/Process/ES | Cond No. | Type of Monitoring |
|---------------------------------------|----------|--------------------|
| ---                                   |          |                    |



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|---------------------|----|--|
| FACILITY            | 51 | record keeping/maintenance procedures                              |
| FACILITY            | 52 | record keeping/maintenance procedures                              |
| FACILITY            | 53 | record keeping/maintenance procedures                              |
| FACILITY            | 56 | record keeping/maintenance procedures                              |
| FACILITY            | 57 | record keeping/maintenance procedures                              |
| FACILITY            | 58 | record keeping/maintenance procedures                              |
| FACILITY            | 59 | record keeping/maintenance procedures                              |
| FACILITY            | 60 | record keeping/maintenance procedures                              |
| FACILITY            | 62 | record keeping/maintenance procedures                              |
| FACILITY            | 63 | record keeping/maintenance procedures                              |
| FACILITY            | 64 | record keeping/maintenance procedures                              |
| FACILITY            | 65 | record keeping/maintenance procedures                              |
| FACILITY            | 66 | record keeping/maintenance procedures                              |
| FACILITY            | 5  | record keeping/maintenance procedures                              |
| FACILITY            | 6  | record keeping/maintenance procedures                              |
| FACILITY            | 25 | record keeping/maintenance procedures                              |
| FACILITY            | 26 | record keeping/maintenance procedures                              |
| A-00003             | 78 | monitoring of process or control device parameters<br>as surrogate |
| FACILITY            | 7  | record keeping/maintenance procedures                              |
| FACILITY            | 43 | record keeping/maintenance procedures                              |
| A-00001             | 71 | monitoring of process or control device parameters<br>as surrogate |
| A-00001/-/EXT/BCTEX | 72 | monitoring of process or control device parameters<br>as surrogate |
| A-00001/-/EXT/BCTEX | 73 | record keeping/maintenance procedures                              |
| A-00003/-/EX2       | 79 | monitoring of process or control device parameters<br>as surrogate |
| FACILITY            | 28 | intermittent emission testing                                      |
| FACILITY            | 29 | record keeping/maintenance procedures                              |
| A-00002/-/FLS       | 74 | record keeping/maintenance procedures                              |
| A-00002/-/FLS       | 75 | work practice involving specific operations                        |
| FACILITY            | 30 | record keeping/maintenance procedures                              |
| FACILITY            | 31 | record keeping/maintenance procedures                              |
| FACILITY            | 32 | record keeping/maintenance procedures                              |
| FACILITY            | 33 | 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            | 41 | work practice involving specific operations                        |
| FACILITY            | 42 | work practice involving specific operations                        |
| FACILITY            | 44 | work practice involving specific operations                        |
| A-00002/-/FLS       | 76 | work practice involving specific operations                        |
| A-00002/-/FLS       | 77 | record keeping/maintenance procedures                              |
| FACILITY            | 45 | record keeping/maintenance procedures                              |
| FACILITY            | 46 | record keeping/maintenance procedures                              |
| FACILITY            | 47 | record keeping/maintenance procedures                              |
| FACILITY            | 48 | record keeping/maintenance procedures                              |
| FACILITY            | 49 | record keeping/maintenance procedures                              |
| FACILITY            | 50 | monitoring of process or control device parameters<br>as surrogate |

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**Basis for Monitoring**

Most of the monitoring requirements contained in this permit are based on specific monitoring methods and observations as prescribed in the applicable rules. Facility specific monitoring conditions were written to assure that reliable information is obtained representing the facility's compliance status with the following requirements:

Condition 25 for 6NYCRR Part 201-6.5(f)





**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 8-2614-00117/00038**

**Renewal Number: 2**

**09/14/2012**

This condition outlines the compliance evaluation and recordkeeping requirements for the facility to utilize new coating systems at Emission Units A-00001 and A-00003.

Condition 51 for 40CFR 63-A.10(b)(3)

This condition sets the monitoring, recordkeeping, and reporting requirements for the facility HAP emissions. The purpose of this monitoring condition is to demonstrate the area source status of the facility for 40CFR63 Subpart KK and 40CFR63 Subpart JJJ.

Conditions 71, 72 and 73 for 6NYCRR Part 228-1.3(a)

These conditions set the VOC emissions limit for Emission Unit A-00001 as well as the control, monitoring, and record keeping requirements for Process EXT/Emission Source BCTEX, in accordance with Consent Order No. R8-20030729-22.

Conditions 74 and 75 for 6NYCRR Part 228-1.3(e)(1)

These monitoring conditions set the VOC emissions limit for Process FLS and the associated monitoring, recordkeeping, and reporting requirements based on the RACT reevaluation report submitted to the Department with the Title V renewal application. These conditions pertain to the noncompliant coatings used at Process FLS.

Conditions 76 and 77 for 6NYCRR Part 234.3(f)

These monitoring conditions set the VOC emission limit for Process FLS and the associated monitoring, recordkeeping, and reporting requirements based on the RACT reevaluation report submitted to the Department with the Title V renewal application. These conditions pertain to the noncompliant inks used at process FLS.

Condition 78 for 6NYCRR Part 201-7

This condition sets the VOC emissions limit and the record keeping requirements for Emission Unit A-00003.

Condition 79 for 6NYCRR Part 228-1.3(a)

This condition sets the control, monitoring and record keeping requirements for Process EX2/Emission Source SAMEX.