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
This permit modification (Ren0, Mod1) is for the installation and operation of a new extrusion laminating and coating line, identified as processes EX1 and OZ2.

Attainment Status
AMERICAN PACKAGING CORP is located in the town of CHILI in the county of MONROE. 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.)

<table>
<thead>
<tr>
<th>Criteria Pollutant</th>
<th>Attainment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter (PM)</td>
<td>ATTAINMENT</td>
</tr>
<tr>
<td>Particulate Matter ≤ 10µ in diameter (PM10)</td>
<td>ATTAINMENT</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO2)</td>
<td>ATTAINMENT</td>
</tr>
<tr>
<td>Ozone*</td>
<td>TRANSPORT REGION (NON-ATTAINMENT)</td>
</tr>
<tr>
<td>Oxides of Nitrogen (NOx)**</td>
<td>ATTAINMENT</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>ATTAINMENT</td>
</tr>
</tbody>
</table>

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:
The facility prints, laminates and provides post coatings for a variety of packaging materials used in the food industry. The 215,000 sq. ft. facility contains pre-printing, printing, laminating, ink, recycling, staging and shipping areas, as well as offices, maintenance, and labs. The facility will have two (2) printing lines and two (2) lamination lines.

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):

Emission unit A00001 - This unit consists of three (3) flexographic process using solvent-based and water-based inks to print a variety of packaging materials used in the food industry. The process equipment includes two 10-color flexographic printing presses, each with two natural gas fired dryers, and a corona treater. Each press will be approximately 100 ft in length, 25 ft in width and 25 ft in height. Each press will be capable of printing materials with a width of up to 67 inches and an output speed of approximately 2,000 feet per minute. The printing presses, dryers and corona treaters will all be inside a permanent total enclosure that exhausts to the regenerative thermal oxidizer. The enclosure's static pressure will be set to -0.01 inches of water column and make up air fans will maintain this pressure at all times.

The printed web from the printing presses will be laminated with a packaging material in the laminator. This process will generate VOC emissions from the use of solvent-based and water-based adhesives, solvent-based and water-based lacquers, and water-based cold seal. Prior to passing through the laminator unit, the web will pass over two corona treaters, which will change the surface tension of the web using an electric arc. The proposed equipment will also be controlled by a permanent total enclosure resulting in a capture efficiency of 100% and the laminator exhaust gases will be directed to the regenerative thermal oxidizer. The enclosure's static pressure will be set to -0.01 inches of water column and make up air fans will maintain this pressure at all times.

The drying portion of the laminator will employ natural-gas fired burners that have a total heat input of approximately 2.2 MMBtu/hr.

An additional extrusion, laminating and coating line consists of a surface coating and primer station, three extruders and two ozone treaters with a separate 1 MMBtu/hr dryer.

Emission unit A00001 is associated with the following emission points (EP):
permanent total enclosure that will exhaust to the regenerative thermal oxidizer. All VOC and HAP emissions will be controlled by the regenerative thermal oxidizer. Horizontal bypass stack EP004 will be
used in the event of an emergency shut down. A worst case assumption of 1 emergency shut down is anticipated each month. Process feed will be shut down in the event that the regenerative thermal oxidizer shuts down. The regenerative thermal oxidizer has a design capacity of 60,000 scfm.

Process: EX1 is located at Building MAIN - Paper and plastic film are coated using solvent based extruder primers and melted/extruded polyethylene resins

Process: FPS is located at Main, Building MAIN - Flexographic printing and drying using solvent based inks in a permanent total enclosure that will exhaust to the regenerative thermal oxidizer. All VOC and HAP emissions will be controlled by the regenerative thermal oxidizer. Horizontal bypass stacks EP002 and EP003 will be used in the event of an emergency shut down. A worst case assumption of 1 emergency shut down is anticipated each month. Process feed will be shut down in the event that the regenerative thermal oxidizer shuts down. The regenerative thermal oxidizer has a design capacity of 60,000 scfm.

Process: FPW Flexographic printing and drying using water based inks in a permanent total enclosure that will exhaust to the regenerative thermal oxidizer. All VOC and HAP emissions will be controlled by the regenerative thermal oxidizer. Horizontal bypass stacks EP002 and EP003 will be used in the event of an emergency shut down. A worst case assumption of 1 emergency shut down is anticipated each month. Process feed will be shut down in the event that the regenerative thermal oxidizer shuts down. The regenerative thermal oxidizer has a design capacity of 60,000 scfm.

Process: OZ1 Corona treatment. Paper and film are treated with high voltage electricity in the ozone treaters in a permanent total enclosure that will exhaust to the regenerative thermal oxidizer. Horizontal bypass stack EP004 will be used in the event of an emergency shut down. A worst case assumption of 1 emergency shut down is anticipated each month. All Ozone emissions with be controlled by the regenerative thermal oxidizer. Process feed will be shut down in the event that the regenerative thermal oxidizer shuts down. The regenerative thermal oxidizer has a design capacity of 60,000 scfm.

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

**Title V/Major Source Status**
AMERICAN PACKAGING CORP is subject to Title V requirements. This determination is based on the following information:
The American Packaging Facility is a Major Facility due to its emissions of VOCs. The facility calculated VOC PTE emissions are 65 tons per year, which is above the major source threshold of 50 tons per year for the Ozone transport region.

**Program Applicability**
The following chart summarizes the applicability of AMERICAN PACKAGING CORP with regards to the principal air pollution regulatory programs:

<table>
<thead>
<tr>
<th>Regulatory Program</th>
<th>Applicability</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSD</td>
<td>NO</td>
</tr>
<tr>
<td>NSR (non-attainment)</td>
<td>YES</td>
</tr>
<tr>
<td>NESHAP (40 CFR Part 61)</td>
<td>NO</td>
</tr>
</tbody>
</table>
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 (CAA) 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 CAA. Under Section 112 of the CAA, 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 CAA. 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 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.

<table>
<thead>
<tr>
<th>SIC Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>2759</td>
<td>COMMERCIAL PRINTING, NEC</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>SCC Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>4-02-007-01</td>
<td>SURFACE COATING OPERATIONS</td>
</tr>
<tr>
<td></td>
<td>SURFACE COATING APPLICATION - GENERAL</td>
</tr>
<tr>
<td></td>
<td>Adhesive Application</td>
</tr>
<tr>
<td>4-02-013-01</td>
<td>SURFACE COATING OPERATIONS</td>
</tr>
<tr>
<td></td>
<td>SURFACE COATING OPERATIONS - PAPER COATING</td>
</tr>
<tr>
<td></td>
<td>Coating Operation</td>
</tr>
<tr>
<td>4-02-999-97</td>
<td>SURFACE COATING OPERATIONS</td>
</tr>
<tr>
<td></td>
<td>SURFACE COATING OPERATIONS - MISCELLANEOUS</td>
</tr>
<tr>
<td></td>
<td>Specify in Comments Field</td>
</tr>
<tr>
<td>4-05-003-11</td>
<td>PRINTING/PUBLISHING</td>
</tr>
<tr>
<td></td>
<td>PRINTING/PUBLISHING - GENERAL</td>
</tr>
<tr>
<td></td>
<td>PRINTING - FLOXOGRAPHIC</td>
</tr>
<tr>
<td>4-05-003-16</td>
<td>PRINTING/PUBLISHING</td>
</tr>
<tr>
<td></td>
<td>PRINTING/PUBLISHING - GENERAL</td>
</tr>
<tr>
<td></td>
<td>PRINTING/PUBLISHING: FLEXOGRAPHIC: STEAM: NATE R BASED</td>
</tr>
</tbody>
</table>

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, on the type or amount of 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.

<table>
<thead>
<tr>
<th>Cas No.</th>
<th>Contaminant</th>
<th>PTE lbs/yr</th>
<th>PTE tons/yr</th>
<th>Actual lbs/yr</th>
<th>Actual tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>000123-91-1</td>
<td>1,4-DIETHYLENE DIOXIDE</td>
<td></td>
<td>0.000905</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000091-57-6</td>
<td>2-METHYL NAPHTHALENE</td>
<td></td>
<td>2.39E-6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000108-10-1</td>
<td>2-PENTANONE, 4-METHYL</td>
<td></td>
<td>0.0949</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000080-62-6</td>
<td>2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER</td>
<td></td>
<td>0.002</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000056-49-5</td>
<td>3-METHYLCHOLANTHRENE</td>
<td></td>
<td>1.79E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000057-97-6</td>
<td>7,12-DIMETHYLBENZ[A]ANTHRACENE</td>
<td></td>
<td>1.6E-6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000083-32-9</td>
<td>ACENAPHTHENE</td>
<td></td>
<td>1.79E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000208-96-8</td>
<td>ACENAPHTHYLENE</td>
<td></td>
<td>1.79E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000120-12-7</td>
<td>ANTHRACENE</td>
<td></td>
<td>2.39E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>007440-38-2</td>
<td>ARSENIC</td>
<td></td>
<td>0.0000199</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000071-43-2</td>
<td>BENZENE</td>
<td></td>
<td>0.00021</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000056-55-3</td>
<td>BENZO(A)ANTHRACENE</td>
<td></td>
<td>1.79E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000050-32-8</td>
<td>BENZO(A)PYRENE</td>
<td></td>
<td>1.2E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000205-99-2</td>
<td>BENZO(BJ)FLUORANTHENE</td>
<td></td>
<td>1.79E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000191-24-2</td>
<td>BENZO(G,H)JPERYLENE</td>
<td></td>
<td>1.2E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000207-08-9</td>
<td>BENZO(K)FLUORANTHENE</td>
<td></td>
<td>1.79E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>007440-41-7</td>
<td>BERYLLIUM</td>
<td></td>
<td>1.2E-6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>007440-43-9</td>
<td>CADMIUM</td>
<td></td>
<td>0.000109</td>
<td></td>
<td></td>
</tr>
<tr>
<td>0NY750-00-0</td>
<td>CARBON DIOXIDE EQUIVALENTS</td>
<td></td>
<td>11705</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000630-08-0</td>
<td>CARBON MONOXIDE</td>
<td></td>
<td>8.49</td>
<td></td>
<td></td>
</tr>
<tr>
<td>007440-47-3</td>
<td>CHROMIUM</td>
<td></td>
<td>0.00014</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000218-01-9</td>
<td>CHRYSENE</td>
<td></td>
<td>1.79E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>007440-48-4</td>
<td>COBALT</td>
<td></td>
<td>8.38E-6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000053-70-3</td>
<td>DIBENZ[A,H]ANTHRACENE</td>
<td></td>
<td>1.2E-7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>000111-90-0</td>
<td>ETHANOL, 2-(2-ETHOXYETHOXY)</td>
<td></td>
<td>0.146</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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 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:

1. 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 2 01-6.7 and Part 621.

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

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

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

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

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

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.
Item L: Federally Enforceable Requirements - 40 CFR 70.6(b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

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 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

<table>
<thead>
<tr>
<th>Location</th>
<th>Regulation</th>
<th>Condition</th>
<th>Short Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>FACILITY</td>
<td>ECL 19-0301</td>
<td>68</td>
<td>Powers and Duties of the Department with respect to air pollution control standards of Performance for Stationary Spark Ignition Internal Combustion Engines</td>
</tr>
<tr>
<td>FACILITY</td>
<td>40CFR 60-JJJJ</td>
<td>1 -2</td>
<td>Printing and Publishing NESHAP-Recordkeeping Reciprocating Internal Combustion Engine (RICE) NESHAP COMPLIANCE ASSURANCE MONITORING</td>
</tr>
<tr>
<td>FACILITY</td>
<td>40CFR 63-KK.829(d)</td>
<td>38</td>
<td>Printing and Publishing NESHAP-Recordkeeping Reciprocating Internal Combustion Engine (RICE) NESHAP COMPLIANCE ASSURANCE MONITORING</td>
</tr>
<tr>
<td>FACILITY</td>
<td>40CFR 63-ZZZZ</td>
<td>1 -3</td>
<td>Chemical accident prevention provisions Protection of Stratospheric Ozone - recycling and emissions reduction</td>
</tr>
<tr>
<td>FACILITY</td>
<td>40CFR 64</td>
<td>40</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>40CFR 68</td>
<td>19</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>40CFR 82-F</td>
<td>20</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 200.6</td>
<td>1</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 200.7</td>
<td>10</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 201-1.4</td>
<td>69</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 201-1.7</td>
<td>11</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 201-1.8</td>
<td>12</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 201-3.2(a)</td>
<td>13</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 201-3.3(a)</td>
<td>14</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 201-6</td>
<td>21, 41, 42</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 201-6.4(a) (4)</td>
<td>15</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 201-6.4(a) (7)</td>
<td>2</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6NYCRR 201-6.4(a) (8)</td>
<td>16</td>
<td>Acceptable ambient air quality. Maintenance of equipment. Unavoidable noncompliance and violations</td>
</tr>
</tbody>
</table>
FACILITY 6NYCRR 201-6.4(c) 3
FACILITY 6NYCRR 201-6.4(c) (2) 4
FACILITY 6NYCRR 201-6.4(c) (3) (1) 5
FACILITY 6NYCRR 201-6.4(d) (4) 22
FACILITY 6NYCRR 201-6.4(e) 6
FACILITY 6NYCRR 202-1.1 18
FACILITY 6NYCRR 202-2.1 7
FACILITY 6NYCRR 202-2.5 8
FACILITY 6NYCRR 111.2 1 -1
FACILITY 6NYCRR 215.2 9
A-00001 6NYCRR 228-1.1(a) (3) 24
A-00001 6NYCRR 228-1.3(a) 45
A-00001 6NYCRR 228-1.3(b) 46
A-00001 6NYCRR 228-1.3(c) 25
A-00001 6NYCRR 228-1.3(d) 47
A-00001/-/AL1/ALDW1 6NYCRR 228-1.4(d) (3) 61
A-00001/-/AL1/ALDS1 6NYCRR 228-1.5(b) 53
A-00001/-/AL1/ALDW1 6NYCRR 228-1.6(a) 62
A-00001/-/AL1/ALDW1 6NYCRR 228-1.6(c) 63
A-00001/-/AL1/ALDS1 6NYCRR 228-1.6(d) 54
A-00001/-/AL1/ALDS1 6NYCRR 228-1.6(e) 55
A-00001/-/AL1/ALDS1 6NYCRR 228-1.6(f)(1) 56
A-00001/-/AL1 6NYCRR 228-1.6(h) 52
A-00001/-/AL1/ALDW1 6NYCRR 228-2.4(a) 64
A-00001/-/AL1/ALDS1 6NYCRR 228-2.4(c) 57
A-00001/-/AL1/ALDS1 6NYCRR 228-2.4(d) 58
A-00001/-/AL1/ALDW1 6NYCRR 228-2.5(a) 65

Right to Inspect
Recordkeeping and Reporting of Compliance Monitoring
Records of Monitoring, Sampling and Measurement
Reporting Requirements - Deviations and Noncompliance
Compliance Schedules - Progress Reports
Compliance Certification
Off Permit Changes - Required emissions tests.
Emission Statements - Applicability
Emission Statements - record keeping requirements.
General Prohibitions - visible emissions limited.
Open Fires - Prohibitions
Once in always in
Surface Coating General Requirements - Opacity
Surface Coating General Requirements - Recordkeeping
Surface Coating General Requirements - Prohibitions
Surface Coating General Requirements - Handling, storage and disposal
VOC limits for Paper Film & Foil coatings
Natural gas incineration of VOCs
Surface coating VOC analysis.
Surface coating access for sampling
Surface coating control equipment test methods
Surface coating control efficacy test methods monitoring
incineration controls
Records reporting and maintaining
VOC Content Limits
Emission Control Equipment
Work Practices
Recordkeeping Requirements for 228-
Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

**ECL 19-0301**
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

**6 NYCRR 200.6**
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

**6 NYCRR 200.7**
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and
repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to
inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6 NYCRR 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.
6 NYCRR 211.2
This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, AMERICAN PACKAGING CORP has been determined to be subject to the following regulations:

40 CFR 63.829 (d)
This rule requires that owners or operators of each facility seeking designation as an area source must maintain records of all required measurements and calculations needed to demonstrate compliance with the criteria specified in § 63.820(a)(2). These criteria specify that to be designated an area source under this subpart the facility must use less than 9.1 Mg (10 tons) of each individual HAP and 22.7 Mg (25 tons) of total HAP compounds per rolling 12-month period. Records to be maintained include the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

40 CFR Part 60, Subpart JJJJ

40 CFR Part 63, Subpart ZZZZ
This regulation defines performance standards for stationary reciprocating internal combustion engines

40 CFR Part 64
The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device
emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6 NYCRR 228-1.1 (a) (3)
This citation dictates that any coating line, which is or becomes subject to the requirements of this regulation, will remain subject to its requirements even if the reason they were subject later falls below the applicability threshold.

6 NYCRR 228-1.3 (a)
This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (b)

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.

6 NYCRR 228-1.4 (d) (3)
The citation specifies the maximum VOC content of a coating allowed when coating paper, film or foil.
6 NYCRR 228-1.5 (b)

6 NYCRR 228-1.6 (a)
This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirements of the regulation.

6 NYCRR 228-1.6 (c)
This citation permits Department personnel to enter a facility at reasonable hours for the purpose of collecting samples to verify compliance with VOC content limit requirements.

6 NYCRR 228-1.6 (d)

6 NYCRR 228-1.6 (e)

6 NYCRR 228-1.6 (f) (1)

6 NYCRR 228-1.6 (h)
This citation requires the facility owner or operator to divulge any information or record showing noncompliance with the requirements of the regulation to the Department within 30 days and to maintain this information on the premises for a period of 5 years.

6 NYCRR 228-2.4 (a)
This citation contains the VOC content limits for adhesives and sealants.
6 NYCRR 228-2.4 (c)

6 NYCRR 228-2.4 (d)
This regulation describes the work practices the owner or operator of a facility with total annual actual volatile organic compound emissions of three tons or more must follow to demonstrate compliance with Part 228-2.

6 NYCRR 228-2.5 (a)
This regulation describes the record keeping requirements for facilities that are subject to a volatile organic compound limit in Section 228-2.4(a).

6 NYCRR 228-2.5 (b)
This regulation describes the records that must be kept when an add on control device is used to control VOC emissions.

6 NYCRR 228-2.5 (c)
This regulation requires that the facility owner or operator maintain all records kept pursuant to Part 228-2 for at least five years, and that such records be made available to the Department upon request.

6 NYCRR 228-2.6 (g)

6 NYCRR 229.3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6 NYCRR 231-5.2

6 NYCRR 231-5.3
This section states what an applicant's permit must and will contain for conditions.
6 NYCRR 231-5.4

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

6 NYCRR 234.3 (a) (1) (ii) ('e')

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 234.4 (c)
This regulation specifies that continuous monitoring equipment is required for the following: Combustion zone temperature of all oxidizers; inlet temperature at the catalytic oxidizer bed; break-through of VOC on a carbon adsorption unit; and any other continuous monitoring or recording device required by the Department.

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;
(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
This regulation sets forth the record keeping requirements for facilities subject to the requirements of Part 234.

6 NYCRR 234.8

Compliance Certification
Summary of monitoring activities at AMERICAN PACKAGING CORP:

<table>
<thead>
<tr>
<th>Location</th>
<th>Cond No.</th>
<th>Type of Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>FACILITY</td>
<td>38</td>
<td>record keeping/maintenance procedures</td>
</tr>
<tr>
<td>FACILITY</td>
<td>40</td>
<td>record keeping/maintenance procedures</td>
</tr>
<tr>
<td>FACILITY</td>
<td>5</td>
<td>record keeping/maintenance procedures</td>
</tr>
<tr>
<td>FACILITY</td>
<td>6</td>
<td>record keeping/maintenance procedures</td>
</tr>
<tr>
<td>FACILITY</td>
<td>7</td>
<td>record keeping/maintenance procedures</td>
</tr>
<tr>
<td>A-00001</td>
<td>45</td>
<td>intermittent emission testing</td>
</tr>
<tr>
<td>A-00001</td>
<td>46</td>
<td>record keeping/maintenance procedures</td>
</tr>
<tr>
<td>A-00001</td>
<td>47</td>
<td>record keeping/maintenance procedures</td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDW1 61</td>
<td>monitoring of process or control device parameters as surrogate</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDS1 53</td>
<td>monitoring of process or control device parameters as surrogate</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDW1 62</td>
<td>record keeping/maintenance procedures</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDS1 54</td>
<td>record keeping/maintenance procedures</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDS1 56</td>
<td>monitoring of process or control device parameters as surrogate</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1 52</td>
<td>record keeping/maintenance procedures</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDW1 64</td>
<td>monitoring of process or control device parameters as surrogate</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDS1 57</td>
<td>monitoring of process or control device parameters as surrogate</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDS1 58</td>
<td>record keeping/maintenance procedures</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDS1 65</td>
<td>record keeping/maintenance procedures</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDS1 59</td>
<td>record keeping/maintenance procedures</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/AL1/ALDS1 65</td>
<td>record keeping/maintenance procedures</td>
<td></td>
</tr>
<tr>
<td>FACILITY 27</td>
<td>monitoring of process or control device parameters as surrogate</td>
<td></td>
</tr>
<tr>
<td>FACILITY 29</td>
<td>record keeping/maintenance procedures</td>
<td></td>
</tr>
<tr>
<td>FACILITY 30</td>
<td>monitoring of process or control device parameters as surrogate</td>
<td></td>
</tr>
<tr>
<td>FACILITY 31</td>
<td>record keeping/maintenance procedures</td>
<td></td>
</tr>
<tr>
<td>FACILITY 32</td>
<td>monitoring of process or control device parameters as surrogate</td>
<td></td>
</tr>
<tr>
<td>A-00001 49</td>
<td>monitoring of process or control device parameters as surrogate</td>
<td></td>
</tr>
<tr>
<td>A-00001/-/FPW 67</td>
<td>monitoring of process or control device parameters as surrogate</td>
<td></td>
</tr>
</tbody>
</table>
Basis for Monitoring

All printing presses, corona treaters, dryers and laminators will all be in a permanent total enclosure and emissions will be exhausted and controlled by a regenerative thermal oxidizer. The permanent total enclosure will ensure that all emissions, including VOC and Ozone, are exhausted and controlled by the regenerative thermal oxidizer.

6 NYCRR 228-1 - General requirements for coating line processes at the facility. The coatings involved include the lacquers and cold seal used in the laminating process. This section specifies requirements for handling, storage and disposal of volatile organic compounds. This section also specifies control requirements for emissions of volatile organic compounds including coating application techniques. The facility proposes to use both solvent based and water based coatings in their processes. The water based coatings will meet VOC content requirement. The solvent based coating cannot meet the VOC content requirement, therefore emissions will be controlled through a thermal oxidizer. The destruction removal efficiency under Part 228-1 is 90%. The LAER limits for this facility are 100% capture and 98% destruction removal efficiency of VOCs. The thermal oxidizer design limits for this facility match the LAER limits. The 98% design destruction removal efficiency of this facility meets the Part 228-1 requirement of 90% destruction removal efficiency. Within 180 days after the process begins operation a stack test of the thermal oxidizer will be required to determine operating parameter values to ensure 98% destruction removal efficiency for VOCs. Records shall be kept on site and reports are submitted to the department semi-annually. All printing presses, corona treaters, dryers and laminators will all be in a permanent total enclosure and emissions will be exhausted and controlled by a regenerative thermal oxidizer. The permanent total enclosure will ensure that all emissions, including VOC and Ozone, are exhausted and controlled by the regenerative thermal oxidizer.

6 NYCRR 228-2 - General requirements for coating line processes using adhesives at the facility. The coating involved is the adhesives used in the laminating process. This section specifies requirements for handling, storage and disposal of volatile organic compounds. This section also specifies control requirements for emissions of volatile organic compounds including coating application techniques. The facility proposes to use both solvent based and water based adhesives in their laminating process. The water based adhesive will meet the VOC content requirement. The solvent based adhesive cannot meet the VOC content requirement, therefore emissions will be controlled through a thermal oxidizer. The destruction removal efficiency under Part 228-2 is 85%. The LAER limits for this facility are 100% capture and 98% destruction removal efficiency of VOCs. The thermal oxidizer design limits for this facility match the LAER limits. The 98% design destruction removal efficiency of this facility meets the Part 228-2 requirement of 85% destruction removal efficiency. Within 180 days after the process begins operation a stack test of the thermal oxidizer will be required to determine operating parameter values to ensure 98% destruction removal efficiency for VOCs. Records shall be kept on site and reports are submitted to the department semi-annually.

6 NYCRR 229.3(e)(2)(v) - Volatile Organic Liquid storage tank requirements. This requires that the storage tanks that are less than 10,000 Gallons be equipped with a conservation vent.
6 NYCRR 231-5.4 – This section requires new facilities to perform a Lowest Achievable Emission Rate (LAER) analysis. The LAER analysis is used to determine the minimum emission requirements that a new facility must meet to reduce emissions. The LAER for American Packaging is 100% capture and 98% control for the VOC emissions. Within 180 days after the process begins operation a stack test of the thermal oxidizer will be required to determine operating parameter values to ensure 98% destruction removal efficiency for VOCs.

6 NYCRR 231- This section also has requirements for emission reduction credits. American Packaging must obtain emission reduction credits to offset their VOC emissions in New York State. These credits are obtained from other companies that have produced the reduction credits. This limits the total VOC emissions to 70 TPY. The facility is required to obtain emission offsets in the form of emission reduction credits because it is a new major source of VOC emissions. This cap prevents the facility from having to obtain additional emission reduction credits, under 6 NYCRR Part 231, above what is necessary to start operation of the facility. Records shall be kept on site and reports are submitted to the department semi-annually.

6 NYCRR Part 234 - General requirements for graphic arts facilities using inks in printing processes. This section specifies requirements for handling, storage and disposal of volatile organic compounds. This section also specifies control requirements for emissions of volatile organic compounds. The facility proposes to use both solvent based and water based inks in their processes. The water based inks will meet the VOC content requirement. The solvent based ink cannot meet the VOC content requirement, therefore emissions will be controlled through a thermal oxidizer. The required minimum control efficiency under Part 234 is 80%. The LAER limits for this facility are 100% capture and 98% control efficiency of VOCs. The thermal oxidizer design limits for this facility match the LAER limits. The 98% design control efficiency of this facility meets the Part 234 requirement of 80% control efficiency. Within 180 days after the process begins operation a stack test of the thermal oxidizer will be required to determine operating parameter values to ensure 98% control efficiency for VOCs. Records shall be kept on site and reports are submitted to the department semi-annually.