

**New York State Department of Environmental Conservation
Facility DEC ID: 1282004136**



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

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 1-2820-04136/00001
Effective Date: 06/01/2001
Expiration Date: No expiration date

Permit Issued To: JOSH PACKAGING INC
3550 LAWSON BLVD
OCEANSIDE, NY 11572

Facility: JOSH PACKAGING INC
3550 LAWSON BLVD
OCEANSIDE, NY 11572

Contact: ABE GOLSH
JOSH PACKAGING INC
3550 LAWSON BLVD
OCEANSIDE, NY 11572
(516) 678-9783

Description:

Josh Packaging is a flexographic printing facility located at 3550 Lawson blvd, Oceanside, New York. The facility has two printing presses which are connected to a catalytic oxidizer. The facility is subject to 6NYCRR Part 234. The catalytic oxidizer operates seven months a year from April 1 through October 31. The facility has a seasonal variance so that the catalytic oxidizer does not have to operate from November 1 through March 31. The permit will cap the emissions of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) below 25 tons per year which is calculated on a 12 month rolling average basis. Therefore, the facility will be excluded from the Title V facility permitting requirements under Clean Air Amendments of 1990 and 6NYCRR Part 201. This emission limits will be enforced by restrictions of ink/solvent usage and by operating the oxidizer at a minimum 60% overall control efficiency. A stack test shall be performed for the oxidizer within 180 days after issuance of this permit to demonstrate that the overall control efficiency of the control device is greater than 60% as specified by 6NYCRR Part 234.3.

New York State Department of Environmental Conservation
Facility DEC ID: 1282004136



By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator:

MARK CARRARA
DIVISION OF ENVIRONMENTAL PERMITS
SUNY CAMPUS, LOOP ROAD, BUILDING 40
STONY BROOK, NY 11790-2356

Authorized Signature:

_____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal-REGION 1
HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Item 3.1:

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

Item 3.2:

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

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

New York State Department of Environmental Conservation
Facility DEC ID: 1282004136



Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

****** Facility Level ******

Condition 5: Submission of Applications for Permit Modification or Renewal-REGION 1 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator

Region 1 Headquarters

Division of Environmental Permits
SUNY Campus, Loop Road, Building 40

Brook, NY 11790-2356

(631) 444-0365

New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: JOSH PACKAGING INC
3550 LAWSON BLVD
OCEANSIDE, NY 11572

Facility: JOSH PACKAGING INC
3550 LAWSON BLVD
OCEANSIDE, NY 11572

Authorized Activity By Standard Industrial Classification Code:
2759 - COMMERCIAL PRINTING, NEC

New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 14 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 3 6NYCRR 200.7: Maintenance of equipment
- 7 6NYCRR 201-1.7: Recycling and Salvage
- 8 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected

Contaminants to the Air

- 10 6NYCRR 201-3.2(a): Proof of Eligibility
- 11 6NYCRR 201-3.3(a): Proof of Eligibility
- 12 6NYCRR 202-1.1: Required emissions tests
- 13 6NYCRR 211.3: Visible emissions limited.

6NYCRR 200.5: Sealing

- 2 6NYCRR 200.6: Acceptable ambient air quality
- 4 6NYCRR 201-1.2: Unpermitted Emission Sources
- 5 6NYCRR 201-1.4: Unavoidable Noncompliance and Violations
- 6 6NYCRR 201-1.5: Emergency Defense
- 9 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 15 6NYCRR 234.4(b)(3): Compliance Demonstration
- 16 6NYCRR 234.4(b)(3): Compliance Demonstration
- 17 40CFR 63, Subpart KK: Compliance Demonstration

Emission Unit Level

EU=U-00001

- 19 6NYCRR 234.3(a)(3)(iii): Compliance Demonstration
- 20 6NYCRR 234.3(e): control requirement
- 21 6NYCRR 234.3(f)(3): Compliance Demonstration
- 18 6NYCRR 234.4(a): Compliance Demonstration
- 22 6NYCRR 234.4(a)(2): Compliance Demonstration
- 23 6NYCRR 234.4(b)(1): control requirement
- 24 6NYCRR 234.4(c)(2): temperature rise
- 25 6NYCRR 234.5(a): prohibition of sale or specification
- 26 6NYCRR 234.6: Handling, storage, and disposal of volatile organic compounds

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 27 6NYCRR 201-5: General Provisions
- 28 6NYCRR 201-5: Permit Exclusion Provisions
- 29 6NYCRR 201-5: Emission Unit Definition
- 30 6NYCRR 201-5.3(b): Contaminant List
- 31 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 32 6NYCRR 201-5: Emission Point Definition By Emission Unit



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

33 6NYCRR 201-5: Process Definition By Emission Unit

Permit Effective Date: 06/01/2001

Permit Expiration Date: No expiration date.



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

Condition 14: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 14.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Maintenance of equipment

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 3.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Recycling and Salvage

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 7.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Condition 8: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 8.1:

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Proof of Eligibility

Effective between the dates of 06/01/2001 and Permit Expiration Date



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

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

Item 10.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Proof of Eligibility

Effective between the dates of 06/01/2001 and Permit Expiration Date

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

Item 11.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Required emissions tests

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 12.1:

An acceptable report of measured emissions shall be submitted, as may be required by the commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Visible emissions limited.

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 13.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

minute period per hour of not more than 57 percent opacity.

Condition 1: Sealing
Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

(a) The commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the commissioner issued in the case of the violation. Sealing means labelling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

(b) No person shall operate any air contamination source sealed by the commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality
Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

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

Condition 4: Unpermitted Emission Sources
Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 4.1:

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136



(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Condition 5: Unavoidable Noncompliance and Violations
Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.4

Item 5.1:

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

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

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate

the emission rates.

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

taminants emitted.

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



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

Condition 6: Emergency Defense

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 6.1:

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 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.

Condition 9: Public Access to Recordkeeping

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.10(a)

Item 9.1:

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1) , and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Compliance Demonstration



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(b)(3)

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0

VOC

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

INK & SOLVENT PURCHASES WILL BE RECORDED MONTHLY ON A COMPUTER SPREADSHEET. VOCS OF INK IN FORMULATIONS WILL BE RECORDED AND RECORDS WILL BE MAINTAINED @ FAC FOR 5 YRS. USAGE WILL BE TRACKED & EMISSION WILL BE RECORDED WITH AND WITHOUT ADD-ON CONTROLS.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Compliance Demonstration

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(b)(3)

Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0

VOC

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks, VOC and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the Department's



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the Commissioner's representative in a format acceptable to him or her. Records must be maintained at the facility for a period of five years.

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

1. The brand and product name or code for the material.
2. The quantity of material used during the calendar month.
3. The VOC content of the material.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Compliance Demonstration

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable 40CFR 63, Subpart KK

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: ONY100-00-0

HAP

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

INK & SOLVENT PURCHASES WILL BE RECORDED MONTHLY ON A COMPUTER SPREADSHEET. HAPS OF INK IN FORMULATIONS WILL BE RECORDED AND RECORDS WILL BE MAINTAINED @ FAC FOR 5 YRS. USAGE WILL BE TRACKED & EMISSION WILL BE RECORDED WITH AND WITHOUT ADD-ON CONTROLS.

New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136



Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Compliance Demonstration

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable 6 NYCRR 234.3(a)(3)(iii)

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0

VOC

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The capture system and the air cleaning device used to control emissions for any flexographic printing process must provide for an overall reduction in VOC emissions of at least 60 percent. Stack emissions testing used to verify compliance with this limit should be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing should be completed within 180 days after permit issuance.

Parameter Monitored: VOC

Lower Permit Limit: 60 percent reduction by weight

Reference Test Method: Method 25 (40CFR60)

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

control requirement

Effective between the dates of 06/01/2001 and Permit Expiration Date



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 20.1:

Condition applies to Emission Unit: U-00001

Item 20.2:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 10 percent or greater for any consecutive six-minute period from any emission source subject to 6 NYCRR Part 234.

Compliance Demonstration

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.3(f)(3)

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0

VOC

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The commissioner may allow sources which use natural gas fired afterburners as control devices for processes subject to Part 234, to shut down these natural gas fired afterburners from November 1st through March 31st for the purposes of natural gas conservation, provided that the commissioner has determined that this action will not jeopardize air quality. Such information shall be submitted with the application for a permit to construct, a certificate to operate, or renewal of a certificate to operate for an existing source under the provisions of Part 201.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Compliance Demonstration

Effective between the dates of 06/01/2001 and Permit Expiration Date



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

Applicable Federal Requirement: 6NYCRR 234.4(a)

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0

VOC

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A PERFORMANCE TEST SHALL BE PERFORMED WITHIN 180 DAYS AFTER ISSUANCE OF THIS PERMIT TO DEMONSTRATE THAT THE OVERALL CONTROL EFF. OF THE CAPTURE SYSTEM AND CONTROL EQUIPMENT IS ABOVE 60% AS REQUIRED BY 234.3(a)(3). TEST REPORT DUE

WITHIN 60 DAYS OF TEST.

Lower Permit Limit: 60 percent reduction by weight

Reference Test Method: METHOD 25

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Compliance Demonstration

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(a)(2)

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0

VOC

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

When a printing process utilizes control equipment to comply with the provisions of 6NYCRR Part 234, test methods acceptable to the Department of Environmental Conservation must be used when demonstrating the overall removal efficiency of the control equipment.

For control equipment other than VOC/solvent recovery, this demonstration must include provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of these air contaminants by control equipment prior to their release to the atmosphere.

Parameter Monitored: VOC

Lower Permit Limit: 60 percent reduction by weight

Reference Test Method: Per 234.4(b)

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

control requirement

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(b)(1)

Item 23.1:

Condition applies to Emission Unit: U-00001

Item 23.2:

The owner or operator must follow notification requirements, protocol requirements and test procedures of 6NYCRR Part 202 for testing and monitoring. Depending upon the conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 must be used when measuring volatile organic compound (VOC) concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

(a) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography,

(b) Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon,

(c) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame

Ionization Analyzer.

(d) Methods not listed above must be approved in advance by the commissioner's representative and the United States Environmental Protection Agency.

Condition 24: temperature rise



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(c)(2)

Item 24.1:

Condition applies to Emission Unit: U-00001

Item 24.2:

A continuous monitor which measures the temperature rise across the catalytic incinerator bed shall be installed, periodically calibrated and operated at all times the catalytic incinerator is operating.

Condition 25: prohibition of sale or specification

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.5(a)

Item 25.1:

Condition applies to Emission Unit: U-00001

Item 25.2:

No person shall sell, specify, or require for use, the application of a coating or ink on a substrate at a facility with a printing process subject to the volatile organic compound control requirements of 6 NYCRR Part 234 if such use is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which any coating or ink is to be applied to any substrate at any affected facility. This prohibition shall not apply to the following:

(1) coatings and/or inks utilized at printing processes where control equipment has been installed to achieve compliance;

(2) coatings and/or inks utilized at printing processes that have been granted variances for reasons of technological and economic feasibility.

Condition 26: Handling, storage, and disposal of volatile organic compounds

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.6

Item 26.1:

Condition applies to Emission Unit: U-00001

Item 26.2:

The following is prohibited:

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

New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136



(b) storage in open containers of spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;

(c) use of open containers to store or dispose of inks and/or surface coatings; or

(d) use of open containers to store or dispense inks and/or surface coatings 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 or coating to a substrate.

New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

Condition 27: General Provisions

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 27.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 27.2:

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.

Item 27.3:

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

Condition 28: Permit Exclusion Provisions

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 28.1:

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 currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant 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 by the Department and the receipt thereof by the Applicant does not supersede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements



New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136

contained in such order or modification thereof unless specifically intended by this permit.

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 the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not

ssed in this permit.

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 the right of the Department to pursue any claims for natural resource damages against the Applicant.

Emission Unit Definition

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 29.1:

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

Emission Unit: U-00001

Emission Unit Description:

TWO FLEXOGRAPHIC PRESSES DUCTED TO A CATALYTIC THERMAL OXIDIZER. THIS UNIT WILL OPERATE UNDER A SEASONAL SCHEDULE WITH THE OXIDIZER RUNNING ONLY SEVEN MONTHS DURING THE YEAR FROM APRIL 1 THROUGH OCTOBER 31. DURING THE FIVE MONTHS , NOVEMBER 1 THROUGH MARCH 31, UNDER THE SEASONAL VARIANCE, THE EMISSIONS WILL BE DIRECTED TO OUTSIDE USING

TWO INDEPENDENT VENTS.

Building(s): M

Condition 30: Contaminant List

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5.3(b)

Item 30.1:

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

CAS No: 0NY100-00-0

Name: HAP

New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136



CAS No: 0NY998-00-0

Name: VOC

Air pollution prohibited

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 31.1:

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. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

Condition 32: Emission Point Definition By Emission Unit

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 32.1:

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

Emission Unit: U-00001

Emission Point: 00001

Height (ft.): 20

Length (in.): 10

Width (in.): 14

NYTMN (km.): 4499.594

NYTME (km.): 613.994

Building: M

Emission Point: 00002

Height (ft.): 20

Length (in.): 10

Width (in.): 14

NYTMN (km.): 4499.594

NYTME (km.): 613.994

Building: M

Emission Point: 000X1

Height (ft.): 25

Diameter (in.): 30

NYTMN (km.): 4499.594

NYTME (km.): 613.994

Building: M

Condition 33: Process Definition By Emission Unit

Effective between the dates of 06/01/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

New York State Department of Environmental Conservation

Permit ID: 1-2820-04136/00001

Facility DEC ID: 1282004136



Item 33.1:

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

Emission Unit: U-00001

Process: P01

Source Classification Code: 4-05-003-11

Process Description:

TWO FLEXOGRAPHIC PRINTING PRESSES
OPERATING BETWEEN APRIL 1 AND OCTOBER 31 OF
EACH YEAR WITH SOLVENT EMISSIONS TREATED BY
A CATALYTIC THERMAL OXIDIZER.

Emission Source/Control:

000X1 - Control

Control Type: CATALYTIC OXIDATION

Emission Source/Control:

00001 - Process

Design Capacity: 1,000 cubic feet per minute

Emission Source/Control:

00002 - Process

Design Capacity: 4,000 cubic feet per minute

Item 33.2:

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

Emission Unit: U-00001

Process: P02

Source Classification Code: 4-05-003-11

Process Description:

THE SAME TWO FLEXOGRAPHIC PRINTING PRESSES
OF PROCESS P01, BUT OPERATING BETWEEN
NOVEMBER 1 AND MARCH 31 OF EACH YEAR WITH
EMISSIONS VENTING TO THE ATMOSPHERE WHILE
THE OXIDIZER IS SHUTDOWN.

Emission Source/Control:

00001 - Process

Design Capacity: 1,000 cubic feet per minute

Emission Source/Control:

00002 - Process

Design Capacity: 4,000 cubic feet per minute