



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 1-4720-01685/00007
Mod 0 Effective Date: 04/19/2004 Expiration Date: No expiration date.
Mod 1 Effective Date: 06/03/2008 Expiration Date: No expiration date.

Permit Issued To: PRINTPACK INC
2800 OVERLOOK PKWY
ATLANTA, GA 30339

Contact: CAMILO CRUZ
PRINTPACK INC
2800 OVERLOOK PKWY
ATLANTA, GA 30339-0240
(404) 691-1205

Facility: SEAL-IT
70 SCHMITT BLVD
FARMINGDALE, NY 11735

Contact: ERICKA COLUMNA
PRINTPACK - SEAL-IT
70 SCHMITT BLVD
FARMINGDALE, NY 11735
(516) 935-3965

Description:

Seal It is a manufacturer, converter and printer of heat shrink PVC, PET-G, OPS & PLA films. The facility specializes in printed shrink labels, heat shrink bands used for tamper-evidence, and shrink sleeves for promotional multipacks and other shrink products.

The initial Air State Facility Permit was issued to satisfy to the requirement of the Compliance Schedule of the Order on Consent (Order) No. R-120030312-63. The Order requires the submission of a revised air permit application combining the operation of No. 70 and No. 50 Schmitt Boulevard printing facilities in accordance with 6NYCRR Part 201-5 and Part 201-7 to maintain emission capping using synthetic minor permit. Volatile Organic Compounds (VOCs) emissions are capped at 22.5 tons per year (tpy).

Upon issuance of the combined Air State Facility (ASF) permit, the Air Facility Registration No. 1-4720-02601 issued for No. 50 Schmitt Boulevard printing facility was expired.

As required by the said Order, Seal-It installed a Parts Washer and Closed Loop Solvent Recovery System. Based on preliminary conversations with a manufacturer of such system, it is anticipated that a 40% reduction in VOC emissions may result from this installation.

In 2008, an application to modify the permit was submitted. The modification involves replacing three existing adhesive applicators, also known as seamers, with two newer models. Emissions of VOC's will not be affected by this change of equipment.



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: SUSAN ACKERMAN
 NYSDEC - SUNY @ STONY BROOK
 50 CIRCLE RD
 STONY BROOK, NY 11790-3409

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 compliance 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 any 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

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
 - Applications for permit renewals, modifications and transfers
 - Applications for Permit Renewals and Modifications
 - Permit modifications, suspensions or revocations by the Department
 - Permit Modifications, Suspensions and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal-REGION 1 HEADQUARTERS
- Submission of application 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 1-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 1-1.1:

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 1-1.2:

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.

Item 1-1.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.



Condition 3: Applications for Permit Renewals and Modifications

Applicable State Requirement: 6NYCRR 621.13

Expired by Mod No: 1

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.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 1-2: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6NYCRR 621.13

Item 1-2.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

Condition 4: Permit Modifications, Suspensions and Revocations by the Department

Applicable State Requirement: 6NYCRR 621.14

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any



provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

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

Condition 5: Submission of Applications for Permit Modification or Renewal-REGION 1

HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.5(a)

Expired by Mod No: 1

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
Stony Brook, NY 11790-2356
(631) 444-0365

Condition 1-3: Submission of application for permit modification or renewal-REGION 1

HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.6(a)

Item 1-3.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 1 Headquarters
Division of Environmental Permits
Stony Brook University
50 Circle Road
Stony Brook, NY 11790-3409
(631) 444-0365



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:PRINTPACK INC
2800 OVERLOOK PKWY
ATLANTA, GA 30339

Facility: SEAL-IT
70 SCHMITT BLVD
FARMINGDALE, NY 11735

Authorized Activity By Standard Industrial Classification Code:
2754 - COMMERCIAL PRINTING, GRAVURE
2759 - COMMERCIAL PRINTING, NEC

Mod 0 Permit Effective Date: 04/19/2004

Permit Expiration Date: No expiration date.

Mod 1 Permit Effective Date: 06/03/2008

Permit Expiration Date: No expiration date.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

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Facility Level

- Submission of Applications for Permit Modification or Renewal-REGION 1 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 1 HEADQUARTERS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-1 6NYCRR 200.7: Maintenance of Equipment
- 1-2 6NYCRR 200.7: Compliance Demonstration
- 1-3 6NYCRR 201-7.2: Facility Permissible Emissions
- *1-4 6NYCRR 201-7.2: Capping Monitoring Condition
- 4 6NYCRR 234.1(g): Facilities subject to Part 234 remain subject even if emissions go below applicability threshold
- 5 6NYCRR 234.6: Compliance Demonstration

Emission Unit Level

EU=0-00001

- 6 6NYCRR 234.3(e): Compliance Demonstration
- 7 6NYCRR 234.4(b)(3): Compliance Demonstration

EU=0-00001,EP=00001

- 8 6NYCRR 234.3(a)(3)(iv): control requirements
- 9 6NYCRR 234.4(a)(2): Compliance Demonstration
- 10 6NYCRR 234.4(c): control requirement

EU=0-00002

- 11 6NYCRR 234.3(e): Compliance Demonstration
- 12 6NYCRR 234.4(b)(3): Compliance Demonstration

EU=0-00002,EP=00004

- 13 6NYCRR 234.3(a)(3)(iv): control requirements
- 14 6NYCRR 234.4(a)(2): Compliance Demonstration
- 15 6NYCRR 234.4(c): control requirement

EU=0-00003

- 16 6NYCRR 228.3(e)(1): Compliance Demonstration
- 17 6NYCRR 228.4: Compliance Demonstration



- 18 6NYCRR 228.5(c): Compliance Demonstration
- 19 6NYCRR 228.10: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 20 ECL 19-0301: Contaminant List
- 21 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 22 6NYCRR 201-5: Emission Unit Definition
- 23 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 24 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 25 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6NYCRR Part 200.5

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 labeling 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.

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.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

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.

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

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.



Item D: Unpermitted Emission Sources - 6NYCRR Part 201-1.2

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.

(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.

Item E: Emergency Defense - 6NYCRR Part 201-1.5

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

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

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

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

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

(4) The facility owner and/or operator notified the Department

within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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



Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

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.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 201-1.8

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.

Item H: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 201-3.2(a)

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.

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)

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.

Item J: Required Emission Tests - 6 NYCRR Part 202-1.1

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.

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item L: Open Fires - 6 NYCRR Part 215

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.

Item M: 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 N: 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.

FEDERAL APPLICABLE REQUIREMENTS



The following conditions are federally enforceable.

Condition 1-1: Maintenance of Equipment
Effective between the dates of 06/03/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 200.7

Item 1-1.1:

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.

Condition 1-2: Compliance Demonstration
Effective between the dates of 06/03/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 200.7

Item 1-2.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The thermal oxidizers (Emission Control No. 000001 and No. 000002) must be kept in a satisfactory state of maintenance and repair. Under no circumstance are these emission control devices to be operated under a BYPASS MODE, unless it becomes essential for the health and safety of the employees, and safety of the equipment.

The facility owner and/or operator shall compile and maintain records of all equipment maintenance including the opening and closing of dampers/bypasses.

In the event that use of a bypass damper becomes essential, immediate corrective actions shall be taken (e.g., cease printing operation, evacuate building if necessary, seek assistance to emergency responsive team etc.). The facility owner and/or operator shall report such usage by telephone to the commissioner's representative as soon as possible, during normal working hours, but not later than two working days after becoming aware that the malfunction occurred.

Within 30 days, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, corrective



action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements may be superseded by conditions elsewhere in this permit which containing more stringent reporting and notification provisions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

Subsequent reports are due every 12 calendar month(s).

Condition 1-3: Facility Permissible Emissions
Effective between the dates of 06/03/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 1-3.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0 (From Mod 1) PTE: 45,000 pounds per year
Name: VOC

Condition 1-4: Capping Monitoring Condition
Effective between the dates of 06/03/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 1-4.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 1-4.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-4.3:

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.

Item 1-4.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all



emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-4.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The maximum total annual VOC emissions, rolled monthly, is 22.5 tons (45,000 pounds).

Records of monthly ink, solvent, and adhesive usage shall be maintained. Records of technical information based upon purchases of VOC-containing inks, solvents, and adhesives shall be maintained on a computer spreadsheet.

VOC emissions shall be calculated monthly; taking into account the presence or absence of emission controls. Monthly, these calculations shall be used to determine the rolling annual total for VOC emissions.

All records will be maintained at the facility for five years.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: VOC

Upper Permit Limit: 22.5 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

Subsequent reports are due every 3 calendar month(s).

Condition 4: Facilities subject to Part 234 remain subject even if emissions go below applicability threshold Effective between the dates of 04/19/2004 and Permit Expiration Date



Applicable Federal Requirement:6NYCRR 234.1(g)

Item 4.1:

Any printing process that is subject to the provisions of 6NYCRR Part 234 will remain subject to these provisions even if the emissions of volatile organic compounds from the facility later fall below the applicability criteria.

**Condition 5: Compliance Demonstration
Effective between the dates of 04/19/2004 and Permit Expiration Date**

Applicable Federal Requirement:6NYCRR 234.6

Item 5.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following work practices are 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;
- (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.

To ensure that these work practices are not in use, the facility will conduct daily inspections for the presence of any open containers as described in the prohibitions above and maintain a log book of these inspections. Any such open containers shall be closed immediately. The log book should include the following information at a minimum:

- date and time of inspection
- items or areas observed



- corrective measures taken, if necessary.

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Condition 6: Compliance Demonstration
Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 234.3(e)

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

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 6NYCRR Part 234.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 7: Compliance Demonstration
Effective between the dates of 04/19/2004 and Permit Expiration Date

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

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 7.2:

Compliance Demonstration shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Spreadsheets calculating VOC emissions based on MSDS and purchasing records will be used to determine annual compliance.

Monitoring Frequency: MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

Subsequent reports are due every 3 calendar month(s).

Condition 8: control requirements

Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 234.3(a)(3)(iv)

Item 8.1:

This Condition applies to Emission Unit: 0-00001 Emission Point: 00001

Item 8.2:

The overall removal efficiency is determined by testing the capture efficiency and the removal efficiency of the control equipment, utilizing test methods acceptable to the commissioner.

Condition 9: Compliance Demonstration

Effective between the dates of 04/19/2004 and Permit Expiration Date

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

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Emission Point: 00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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.

Manufacturer Name/Model Number: Wolverine Oxidixer

Parameter Monitored: VOC

Lower Permit Limit: 95 percent

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

Condition 10: control requirement
Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 234.4(c)

Item 10.1:

This Condition applies to Emission Unit: 0-00001 Emission Point: 00001

Item 10.2:

If an air cleaning device is used, continuous monitors of the following parameters shall be installed, periodically calibrated and operated at all times that the associated control equipment is operating:

- (a) exhaust gas temperature of all incinerators;
- (b) temperature rise across catalytic incinerator bed;
- (c) breakthrough of volatile organic compounds on a carbon adsorption unit; and
- (d) any other continuous monitoring or recording device required by the commissioner.

Condition 11: Compliance Demonstration
Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 234.3(e)

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00002

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

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 6NYCRR Part 234.

Parameter Monitored: OPACITY



Upper Permit Limit: 10 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective between the dates of 04/19/2004 and Permit Expiration Date

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

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Spreadsheets calculating VOC emissions based on MSDS and purchasing records will be used to determine annual compliance.

Monitoring Frequency: MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

Subsequent reports are due every 3 calendar month(s).

Condition 13: control requirements
Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 234.3(a)(3)(iv)

Item 13.1:

This Condition applies to Emission Unit: 0-00002 Emission Point: 00004

Item 13.2:

The overall removal efficiency is determined by testing the capture efficiency and the removal efficiency of the control equipment, utilizing test methods acceptable to the commissioner.

Condition 14: Compliance Demonstration
Effective between the dates of 04/19/2004 and Permit Expiration Date

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

Item 14.1:



The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00002

Emission Point: 00004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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.

Manufacturer Name/Model Number: Megtec Oxidixer

Parameter Monitored: VOC

Lower Permit Limit: 95 percent

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

Condition 15: control requirement

Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 234.4(c)

Item 15.1:

This Condition applies to Emission Unit: 0-00002 Emission Point: 00004

Item 15.2:

If an air cleaning device is used, continuous monitors of the following parameters shall be installed, periodically calibrated and operated at all times that the associated control equipment is operating:

- (a) exhaust gas temperature of all incinerators;
- (b) temperature rise across catalytic incinerator bed;
- (c) breakthrough of volatile organic compounds on a carbon adsorption unit; and
- (d) any other continuous monitoring or recording device required by the commissioner.

Condition 16: Compliance Demonstration



Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.3(e)(1)

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

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:

The adhesive applicator machines have been granted a variance from the 80% overall VOC removal requirements and Tables 1 and 2 of 6NYCRR Part 228. Reasonably Available Control Technology (RACT) of these machines was determined to be 6.5 pounds VOC per gallon. Adhesive purchases will be recorded monthly to demonstrate compliance.

Monitoring Frequency: MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

Subsequent reports are due every 3 calendar month(s).

Condition 17: Compliance Demonstration

Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.4

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions when the process is in operation. If any



visible emissions are identified, corrective action is required. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 18: Compliance Demonstration

Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.5(c)

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Spreadsheets calculating VOC emissions based on MSDS and purchasing records will be used to determine annual compliance.

Monitoring Frequency: MONTHLY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

Subsequent reports are due every 3 calendar month(s).

Condition 19: Compliance Demonstration

Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.10

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of this facility subject to 6NYCRR Part 228 must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents.
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and

All associated coating line work area(s) within the facility shall be inspected daily to determine if there are any open containers present, and that only acceptable spray gun cleaning methods were utilized. A log book shall be maintained to record these inspections and their results. The log book shall include the following information:

- date and time of inspection
- items or areas observed
- corrective measures taken, if necessary

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

New York State Department of Environmental Conservation

Permit ID: 1-4720-01685/00007

Facility DEC ID: 1472001685





STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6NYCRR Part 201-1.10(a)

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.

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.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 20: Contaminant List
Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 20.1:

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

CAS No: 0NY998-00-0

Name: VOC

Condition 21: Unavoidable noncompliance and violations
Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 21.1:

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 issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. 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 of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(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 contaminants 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.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 22: Emission Unit Definition
Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 22.1(From Mod 1):

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

Emission Unit: 0-00003

Emission Unit Description:

Adhesive applicator machines (also called seamers) each applying a specialty adhesive. In 2008 three BJK-PVC seamers in Building 50 were replaced with two Karlville K5 350D units. After the installation of the Karlville seamers, there will be seven (7) BJK-PVC seamers, five (5) Phoenix-USA seamers, and two (2) Karlville seamers.

Eleven (11) of the machines are in Building B-70 and three (3) of the machines are located in Building B-50. In Building B-70, emissions from the applicators are directed to three (3) external vents. In Building B-50, the emissions are exhausted to a common vent.

All vents emit directly to the atmosphere.

Building(s): B-50
B-70

Item 22.2(From Mod 0):

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

Emission Unit: 0-00001

Emission Unit Description:

This Emission Unit consists of seven (7) flexographic printing presses with electric or natural gas-fired driers, and one (1) gravure printing press with natural gas-fired drier, all commonly vented to a Wolverine (20,000 standard cubic feet per minute) catalytic thermal oxidizer with a demonstrated destruction efficiency in excess of 95 percent. The press room is operated in a permanent and total enclosure with 100 percent capture.



Building(s): B-70

Item 22.3(From Mod 0):

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

Emission Unit: 0-00002

Emission Unit Description:

One gravure printing press vented to a Megtec (Model No. AF-40/334A47) catalytic thermal oxidizer located at Building B-50.

This Emission Unit produces flexible packaging - shrink seal labels on a 10 color Rotomec Gravure Printing Press. Emissions will be exhausted to a Megtec 18,000 standard cubic feet per minute (scfm) Catalytic Oxidizer with a demonstrated destruction efficiency in excess of 95 percent. The gravure press will operate in a permanent and total enclosure with 100 percent capture.

Building(s): B-50

Condition 23: Air pollution prohibited
Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable State Requirement:6NYCRR 211.2

Item 23.1:

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 24: Emission Point Definition By Emission Unit
Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 24.1(From Mod 0):

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

Emission Unit: 0-00001

Emission Point: 00001

Height (ft.): 28

Diameter (in.): 38

NYTMN (km.): 4511.623 NYTME (km.): 633.333 Building: B-70

Item 24.2(From Mod 0):



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

Emission Unit: 0-00002

Emission Point: 00004

Height (ft.): 29 Diameter (in.): 46
NYTMN (km.): 4511.5 NYTME (km.): 633.2 Building: B-50

Item 24.3(From Mod 0):

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

Emission Unit: 0-00003

Emission Point: 00002

Height (ft.): 20 Length (in.): 16 Width (in.): 16
NYTMN (km.): 4511.623 NYTME (km.): 633.333 Building: B-70

Emission Point: 00003

Height (ft.): 28 Length (in.): 16 Width (in.): 16
NYTMN (km.): 4511.623 NYTME (km.): 633.333 Building: B-70

Emission Point: 00005

Height (ft.): 20 Length (in.): 16 Width (in.): 16
NYTMN (km.): 4511.5 NYTME (km.): 633.2 Building: B-50

Emission Point: 00006

Height (ft.): 20 Length (in.): 16 Width (in.): 16
NYTMN (km.): 4511.623 NYTME (km.): 633.333 Building: B-70

Condition 25: Process Definition By Emission Unit
Effective between the dates of 04/19/2004 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 25.1(From Mod 1):

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

Emission Unit: 0-00003

Process: P04 Source Classification Code: 4-02-007-01

Process Description:

Adhesive applicator machines (also called seamers) each applying a specialty adhesive.

Eleven (11) of the machines are in Building B-70 and three (3) of the machines are located in Building B-50. In Building B-70, emissions from the applicators are directed to three (3) external vents. In Building B-50, the emissions are exhausted to a common vent.

All vents emit directly to the atmosphere.
The prior approved variance from RACT per 6NYCRR Part 228.3(e) shall be continued by maintaining the VOC content of the tetrahydrofuran-containing solvent (which poisons



the oxidizer catalyst and thus cannot go through the oxidizer) to at or below 6.5 lbs VOC per gallon material based on the average MSDS specific gravity or density provided.

Emission Source/Control: 0000A - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000F - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000H - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000I - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000K - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000N - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000T - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000U - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000V - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000X - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000Y - Process
Design Capacity: 855 feet per minute

Emission Source/Control: 0000Z - Process
Design Capacity: 855 feet per minute

Emission Source/Control: KRLV1 - Process
Design Capacity: 400 meters per minute

Emission Source/Control: KRLV2 - Process
Design Capacity: 400 meters per minute

Item 25.2(From Mod 0):

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

Emission Unit: 0-00001

Process: P01

Source Classification Code: 4-05-003-01

Process Description:



Seven (7) flexographic printing presses commonly ducted to a Wolverine natural gas-fired catalytic thermal oxidizer.

Emission Source/Control: 00001 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00PFC - Process
Design Capacity: 500 cubic feet per minute

Emission Source/Control: 00PFD - Process
Design Capacity: 600 cubic feet per minute

Emission Source/Control: 00PFE - Process
Design Capacity: 1,800 cubic feet per minute

Emission Source/Control: 00PFK - Process
Design Capacity: 600 cubic feet per minute

Emission Source/Control: 00PFL - Process
Design Capacity: 500 cubic feet per minute

Emission Source/Control: 00PFP - Process
Design Capacity: 1,500 cubic feet per minute

Emission Source/Control: 00PFQ - Process
Design Capacity: 5,000 cubic feet per minute

Item 25.3(From Mod 0):

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

Emission Unit: 0-00001
Process: P02 Source Classification Code: 4-05-005-01
Process Description:

One (1) Chestnut gravure printing press vented to the Wolverine natural gas-fired catalytic thermal oxidizer, combined with the emissions from the flexographic presses of Process No. P01.

Emission Source/Control: 00001 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00PGC - Process
Design Capacity: 7,600 cubic feet per minute

Item 25.4(From Mod 0):

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

Emission Unit: 0-00002
Process: P03 Source Classification Code: 4-05-005-01
Process Description:



One (1) Rotomec gravure printing press vented to a Megtec (Model No. AF-40/334A47) catalytic thermal oxidizer located at Building B-50.

Emission Source/Control: 00002 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00PGR - Process
Design Capacity: 14,500 cubic feet per minute

New York State Department of Environmental Conservation

Permit ID: 1-4720-01685/00007

Facility DEC ID: 1472001685

