

New York State Department of Environmental Conservation
Facility DEC ID: 1472804190



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 1-4728-04190/00003
Mod 0 Effective Date: 01/23/2006 Expiration Date: No expiration date.
Mod 1 Effective Date: 11/06/2007 Expiration Date: No expiration date.

Permit Issued To: ALCAN PACKAGING FOOD AND TOBACCO INC
8770 WEST BRYN MAWR AVE
CHICAGO, IL 60681

Contact: DAVID L PASTRICH
ALCAN PACKAGING FOOD & TOBACCO INC
1403 FOURTH AVE
NEW HYDE PARK, NY 11040
(516) 355-2520

Facility: ALCAN PACKAGING
100 WILSHIRE BLVD
EDGEWOOD, NY 11717

Contact: PIOTR SOWA
ALCAN PACKAGING FOOD AND TOBACCO INC
100 WILSHIRE BLVD
BRENTWOOD, NY 11717
(631) 794-2911

Description:
Alcan packaging operates flexographic printing presses for the manufacture of labels. Alcan Packaging was an existing minor facility with one (1) Part 201 Emission Unit.

The facility plans to add two Part 201 Emission Sources, consisting of new presses and a third oxidixer, and capping these sources at 22.5 tpy thus avoiding 231-2 nonattainment applicability (<25 tpy increase). The facility will become a major facility as a result of the modification . Alcan Packaging will add the new Emission Sources through a State Facility permit to be rolled over to a new TV facility permit within one year of commencement of operation of the new emission unit.

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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: ROGER EVANS
 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 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

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



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actual transfer of ownership.

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

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,

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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)

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



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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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8770 WEST BRYN MAWR AVE
CHICAGO, IL 60681

Facility: ALCAN PACKAGING
100 WILSHIRE BLVD
EDGEWOOD, NY 11717

Authorized Activity By Standard Industrial Classification Code:
2671 - PAPER COATED AND LAMINATED PACKAGING
2759 - COMMERCIAL PRINTING, NEC

Mod 0 Permit Effective Date: 01/23/2006

Permit Expiration Date: No expiration date.

Mod 1 Permit Effective Date: 11/06/2007

Permit Expiration Date: No expiration date.



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-1 6NYCRR 201-6.5(a)(7): Fees
- 1-2 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 1-3 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 1-4 6NYCRR 201-6.5(c)(3)(ii): Compliance Demonstration
- 1-5 6NYCRR 202-2.1: Compliance Demonstration
- 1-6 6NYCRR 202-2.5: Recordkeeping requirements
- 1-7 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 1-8 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 1-9 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 1-10 40CFR 68: Accidental release provisions.
- 1-11 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 1-12 6NYCRR 201-1.10(b): Public Access to Recordkeeping
- 1-13 6NYCRR 201-6.2(d)(2): Interim Authorization - Transition to Title V Permit
- 1-14 6NYCRR 201-6.2(d)(2): Compliance Demonstration
- 1-15 6NYCRR 201-6.5(e): Compliance Demonstration
- 1 6NYCRR 201-7: Facility Permissible Emissions
- *1-16 6NYCRR 201-7: Capping Monitoring Condition
- *1-17 6NYCRR 201-7: Capping Monitoring Condition
- *1-18 6NYCRR 201-7: Capping Monitoring Condition
- 1-19 6NYCRR 212.4(a): Compliance Demonstration
- 1-20 6NYCRR 212.4(a): Compliance Demonstration
- 1-22 6NYCRR 231-2.4: Notification and reporting requirements.
- 1-21 6NYCRR 231-2.4: Emission offset requirements
- 5 6NYCRR 234.1(g): Facilities subject to Part 234 remain subject even if emissions go below applicability threshold
- 1-23 6NYCRR 234.3(a)(3)(iii): Compliance Demonstration
- 1-24 6NYCRR 234.3(a)(3)(iii): Compliance Demonstration
- 8 6NYCRR 234.5(a): Prohibition of Sale or Specification
- 9 6NYCRR 234.6: Compliance Demonstration
- 10 40CFR 63.820(a)(7), Subpart KK: Compliance Demonstration
- 11 40CFR 63.830(b)(1), Subpart KK: Compliance Demonstration

Emission Unit Level

EU=0-7USTS

- 1-25 6NYCRR 229.3(e)(2)(v): Compliance Demonstration

EU=1-PRINT

- 1-26 6NYCRR 231-2.5: Compliance Demonstration
- 1-27 6NYCRR 234.3(a)(3)(iii): flexographic printing control requirement

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- 1-28 6NYCRR 234.3(a)(3)(iii): Compliance Demonstration
- 14 6NYCRR 234.3(e): Compliance Demonstration
- 1-29 6NYCRR 234.4(b)(1): control requirement
- 1-30 6NYCRR 234.4(b)(2): control requirement
- 15 6NYCRR 234.4(b)(3): Compliance Demonstration
- 1-31 6NYCRR 234.4(b)(4): sampling

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 201-5.1(a)(1): General Conditions - Synthetic Minor
Facilities Obtaining State Facility Permits
- 24 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 25 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 26 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

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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



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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



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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

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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: Fees

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 1-1.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 1-2: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 1-2.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;



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- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 1-3: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 1-3.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 1-4: Compliance Demonstration

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 1-4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit

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requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill

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Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. 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. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 1-5: Compliance Demonstration
Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 1-5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April
15th each year for emissions of the previous calendar
year.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 1-6: Recordkeeping requirements
Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 1-6.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 1-7: Standard Requirement - Provide Information
Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)



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Item 1-7.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 1-8: General Condition - Right to Inspect

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 1-8.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 1-9: Off Permit Changes

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 1-9.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice



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to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 1-10: Accidental release provisions.

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 68

Item 1-10.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 1-11: Recycling and Emissions Reduction

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 1-11.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

Condition 1-12: Public Access to Recordkeeping

Effective between the dates of 11/06/2007 and Permit Expiration Date

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

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Item 1-12.1:

(a) Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of section 201-5.4(b)(1) of this Part, and/or the emission capping requirements of sections 201-7.2(d), 201-7.3 (f), (g), (h)(5), (i) and (j) of this Part, the department will make such records available to the public upon request in accordance with Part 616 - Public Access to Records of this Title. Emission source owners and/or operators must submit the records required to comply with the request within 60 working days of written notification by the department of receipt of the request.

(b) For facilities subject to Subpart 201-6 of this Part, the department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to section 503(e) of the act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to Records and section 114(c) of the act.

**Condition 1-13: Interim Authorization - Transition to Title V Permit
Effective between the dates of 11/06/2007 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 201-6.2(d)(2)

Item 1-13.1:

The facility owners have proposed modifications to the existing facility; which is regulated under 6 NYCRR 201-5. These modifications will result in an increase in VOC emissions and make the source subject to title V facility permitting. The facility owner shall submit an application for the title V facility permit within 12 months of the commencement of the operations described in this modification.

**Condition 1-14: Compliance Demonstration
Effective between the dates of 11/06/2007 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 201-6.2(d)(2)

Item 1-14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owners and/or operator must notify the Department, in writing, upon commencement of the operations described in this modification. Compliance with this requirement shall be reported in all semi-annual and annual compliance reports.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



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Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-15: Compliance Demonstration

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 1-15.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

i. Compliance certifications shall contain:

- the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
- and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the

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anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

NYSDEC- Region 1 Headquarters
Stony Brook University
50 Circle Road
Stony Brook, NY 11790-3409

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after every calendar year.

Condition 1: Facility Permissible Emissions
Effective between the dates of 01/23/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7

Item 1.1:

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



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

CAS No: 0NY100-00-0 (From Mod 1) PTE: 45,000 pounds per year
Name: HAP

CAS No: 0NY210-00-0 (From Mod 1) PTE: 45,000 pounds per year
Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0 (From Mod 1) PTE: 120,000 pounds per year
Name: VOC

Condition 1-16: Capping Monitoring Condition

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7

Replaces Condition(s) 3

Item 1-16.1:

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 231-2

Item 1-16.2:

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

Item 1-16.3:

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 1-16.4:

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 1-16.5:

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.



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Item 1-16.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 1-16.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall limit its NOx emissions to 22.5 tons per year on a 12 month rolling total basis.

The owner or operator shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria. These records shall be kept on a monthly basis.

Calculation of Monthly Total NOx Emissions:

$$\text{NOx}(t) = \text{NG} + \text{EG} + \text{FP}$$

where:

$\text{NOx}(t)$ = Facility total monthly NOx emissions (tons).

NG = Monthly NOx emissions from all natural gas (NG) fired external combustion sources (tons).

EG = Monthly NOx emissions from all NG fired emergency generators (tons).

FP = Monthly NOx emissions from diesel fired fire pump IC engine (tons).

$$\text{NG} = (\text{NGEC} \times \text{EF}(\text{ng}))/2000$$

NGEC = Total monthly NG firing rate from all NG fired external combustion sources (million cubic feet).

EF(ng) = NOx emission factor (100 lb/million cubic feet)

[AP-42, Section 1.4 Table 1.4-1, small boilers <100 MMBTU/hr, 7/98]

$$\text{EG} = (\text{NGEG} \times \text{Hg} \times \text{EF}(\text{rice}))/2000$$

NGEC = Total monthly NG firing rate from the

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emergency generator (million cubic feet).

Hg = Heating value of NG (1000 BTU/cf).

EF(ric) = NOx emission factor (2.27 lb/MMBTU)

[AP-42, Section 3.2, Table 3.2-3,

7/00 - for a 4 stroke rich burn engine]

$$FP = (FPO \times EF(ric) \times HR(fp))/2000$$

FPO = Rated output of diesel fired fire pump IC engine (210 HP)

EF(ric) = NOx emission factor from manufacturer - Clarke model JU6H-UF50 (1.41E-02 lb/hp-hr).

HR(fp) = Number of hours fire pump engine is operated during the month (hr).

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 1-17: Capping Monitoring Condition

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7

Replaces Condition(s) 2

Item 1-17.1:

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 231-2

Item 1-17.2:

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

Item 1-17.3:

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 1-17.4:



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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 1-17.5:

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 1-17.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-17.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall limit its VOC emissions to 60 tons per year on a 12 month rolling total basis.

The owner or operator shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria.

These records shall be kept on a monthly basis.

Calculation of Monthly Total VOC Emissions:

$VOC(t) = PRINT + GRAPH + CLEAN + COMB$

VOC(t) = Facility total monthly VOC emissions (tons).

PRINT = Monthly VOC emissions from printing operations (tons).

GRAPH = Monthly VOC emissions from graphic operations (tons).

CLEAN = Monthly VOC emissions from parts washer (tons).

COMB = Monthly VOC emissions from combustion sources (tons).

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$$\text{PRINT} = (\text{TP} \times (\text{CEP}/100) \times (1 - \text{DE}/100))/2000$$

TP = Monthly VOC throughput from presses, inkjet printing units, and seaming/forming machines (lbs).

CEP = VOC capture efficiency from presses, inkjet printing units, and seaming/forming machines (%).

DE = VOC destruction efficiency (%).

$$\text{GRAPH} = \text{N} \times (\text{D} + \text{F}) \times (\text{CEG}/100) \times (1 - \text{DE}/100)/2000$$

N = number of square inches of plates made per month (square inches).

D = maximum dryer plate-making VOC emission factor (0.00010 lb/sq. inch).

F = maximum fugitive plate-making VOC emission factor (0.00006 lb/sq. inch).

CEG = VOC capture efficiency from graphic printing areas (%).

DE = VOC destruction efficiency (%).

$$\text{CLEAN} = (\text{TC} \times (\text{CEC}/100) \times (1 - \text{DE}/100))/2000$$

TC = Monthly VOC throughput in parts cleaner (lbs).

CEC = VOC capture efficiency from parts cleaner (%).

DE = VOC destruction efficiency (%).

$$\text{COMB} = \text{NG} + \text{EG} + \text{FP}$$

NG = Monthly VOC emissions from all natural gas (NG) fired external combustion sources (tons).

EG = Monthly VOC emissions from all NG fired emergency generators (tons).

FP = Monthly VOC emissions from diesel fired fire pump IC engine (tons).

$$\text{NG} = (\text{NGEC} \times \text{EF}(\text{ng}))/2000$$

NGEC = Total monthly NG firing rate from all NG fired external combustion sources (million cubic feet).

EF(ng) = VOC emission factor (5.5 lb/million cubic feet)

$$\text{EG} = (\text{NGEG} \times \text{Hg} \times \text{EF}(\text{rice}))/2000$$

NGEC = Total monthly NG firing rate from the emergency generator (million cubic feet).

Hg = Heating value of NG (1000 BTU/cf).



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EF(ric) = VOC emission factor (2.96E-2
lb/MMBTU)

FP = (FPO x EF(icd) x HR(fp))/2000

FPO = Rated output of diesel fired fire pump IC
engine (210 HP)

EF(icd) = Total Hydrocarbon emission factor from
manufacturer - Clarke model JU6H-UF50 (4.63E-04
lb/hp-hr).

HR(fp) = Number of hours fire pump engine is operated
during the month (hr.).

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 1-18: Capping Monitoring Condition

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7

Replaces Condition(s) 4

Item 1-18.1:

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:

40CFR 63-KK

Item 1-18.2:

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

Item 1-18.3:

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 1-18.4:

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



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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 1-18.5:

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 1-18.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 1-18.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall limit its total emissions to less than nine (9) tons for each individual HAP and to less than 22.5 tons for any combination of HAP's on a 12 rolling total basis.

The owner or operator of each facility which commits to the criteria of 40 CFR 63.820(a)(2) for the purpose of capping his or her facility out of 40 CFR 63 Subpart KK shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria.

These records shall be kept on a monthly basis and shall include the mass of all HAP-containing materials used during the month, and the mass fraction of HAP present in each HAP-containing material used.

Calculations:

There are no HAP's expected to be emitted by the printing operations; however if HAP's are present in the solvents used in the printing operations, HAP emissions will be calculated as follows:

Monthly Calculations:

$$\text{HAP}(i) = (\text{TS} \times \text{F}(\text{HAP}(i)) \times \text{CEP} \times (1 -$$

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DE/100))/2000

where:

HAP(i) = Monthly HAP emissions from printing operations of an individual HAP (tons).

TS = Total amount of solvents used during the month (pounds).

CEP = VOC capture efficiency from print lines (percent).

F(HAP(i)) = Maximum fraction of solvents used that is comprised of the individual HAP species.

DE = VOC destruction efficiency in the oxidizers (percent).

Facility Total Emission Rate of all HAP's

$$\text{HAP}(t) = \text{S}(\text{HAP}(i)) + \text{HAP}(c)$$

where:

HAP(t) = Facility total monthly emission rate of all HAP's.

S(HAP(i)) = Monthly sum of all individual HAP emissions from printing operations (tons).

HAP(i) = Monthly HAP emissions from printing operations of an individual HAP (tons).

HAP(c) = Monthly total emission rate of all HAP's from combustion sources (0.053 tons).

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 1-19: Compliance Demonstration

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 1-19.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

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Item 1-19.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility shall operate the oxidizers to ensure that oxidizer capacity is sufficient to achieve a minimum 98% destruction efficiency. The 98% destruction efficiency is required by both BACT (Part 212) and LAER (Part 231-2).

This shall be accomplished through programming controls to disallow press operation if sufficient oxidizer capacity is not on-line.

Sufficient oxidizer capacity shall be based upon the operating parameters determined during the most recent round of performance evaluation testing.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 98 percent reduction by weight

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 1-20: Compliance Demonstration

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 1-20.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-PRINT Emission Point: 00001
Process: 128 Emission Source: OXID1

Emission Unit: 1-PRINT Emission Point: 00001
Process: 129 Emission Source: OXID1

Emission Unit: 1-PRINT Emission Point: 00006



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Process: 128 Emission Source: OXID3

Emission Unit: 1-PRINT Emission Point: 00006
Process: 129 Emission Source: OXID3

Emission Unit: 1-PRINT Emission Point: 00002
Process: 128 Emission Source: OXID2

Emission Unit: 1-PRINT Emission Point: 00002
Process: 129 Emission Source: OXID2

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

Item 1-20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Testing of each of the Catalytic and Thermal Oxidizers will be conducted at least once during the term of this permit in order to demonstrate a minimum VOC destruction efficiency of 98%. The 98% destruction efficiency is required by both BACT (Part 212) and LAER (Part 231-2).

Within 60 days of the effective date of this permit or the installation date of any new oxidizers, whichever is later, a test protocol shall be submitted to the Department for review.

Within 120 days of the effective date or installation date, whichever is later, the testing will be completed.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 98 percent reduction by weight

Reference Test Method: 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 1-22: Notification and reporting requirements.

Effective between the dates of 11/06/2007 and Permit Expiration Date

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Applicable Federal Requirement: 6NYCRR 231-2.4

Item 1-22.1:

At least sixty (60) days prior to the scheduled commence operation date of the proposed source project or proposed major facility, the permittee shall submit any changes to the list of offset sources included in this permit. For each such change, the applicant must submit another "Use of Emission Reduction Credits Form" signed by the applicant and an authorized representative of the new offset source.

Item 1-22. 2:

The facility shall submit to the NYSDEC Regional office a letter of confirmation that each future emission reduction, if any, used to provide emission offsets for this facility has physically occurred. This letter should be submitted, not less than 10 working days, prior to the facility's scheduled start-up date.

Item 1-22.3:

This permit shall be subject to revocation if construction is not commenced within 18 months from the date of issuance of such permit or if construction is discontinued for a period of 18 months or more (excluding any period of time that the permit is subject to challenge in State or Federal court), or if construction is not completed within a reasonable time acceptable to the Department.

Condition 1-21: Emission offset requirements

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2.4

Item 1-21.1:

To satisfy the emission offset requirements of Part 231, the facility has obtained 78 (60 + 30%) VOC Emission Reduction Credits (ERCs) from the following sources:

Facility Name	DEC ID	ERCs (tpy)
Alcan Packaging	1-2820-00185	78

Condition 5: Facilities subject to Part 234 remain subject even if emissions go below applicability threshold

Effective between the dates of 01/23/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.1(g)

Item 5.1:

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 1-23: Compliance Demonstration

Effective between the dates of 11/06/2007 and Permit Expiration Date

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

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Replaces Condition(s) 6

Item 1-23.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-PRINT
Process: 128 Emission Source: OXID2

Emission Unit: 1-PRINT
Process: 128 Emission Source: OXID3

Emission Unit: 1-PRINT
Process: 129 Emission Source: OXID2

Emission Unit: 1-PRINT
Process: 129 Emission Source: OXID3

Emission Unit: 1-PRINT
Process: 131 Emission Source: OXID2

Emission Unit: 1-PRINT
Process: 131 Emission Source: OXID3

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

Item 1-23.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Ensure proper destruction of VOC emissions by maintaining a minimum operating temperature of 1550 degrees Fahrenheit in the thermal regenerative oxidizer to provide an overall control of VOC emissions of 60%.

The temperature shall be continuously monitored and recorded by the oxidizer's temperature control system.

Manufacturer Name/Model Number: Megtech Clean Switch Thermal Regenerative Oxidizer &
TBD

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1550 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED



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VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 1-24: Compliance Demonstration

Effective between the dates of 11/06/2007 and Permit Expiration Date

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

Replaces Condition(s) 7

Item 1-24.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-PRINT

Process: 128

Emission Source: OXID1

Emission Unit: 1-PRINT

Process: 129

Emission Source: OXID1

Emission Unit: 1-PRINT

Process: 131

Emission Source: OXID1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-24.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Ensure proper destruction of VOC emissions by maintaining a minimum operating temperature of 550 degrees Fahrenheit in the catalytic oxidizer to provide an overall control of VOC emissions of 60%.

The temperature shall be continuously monitored and recorded by the oxidizer's temperature control system.

Manufacturer Name/Model Number: Megtec Magnum Catalytic Oxidizer

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED



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VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 8: Prohibition of Sale or Specification
Effective between the dates of 01/23/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.5(a)

Item 8.1:

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 9: Compliance Demonstration
Effective between the dates of 01/23/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.6

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 9.2:

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;



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(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: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 10: Compliance Demonstration

Effective between the dates of 01/23/2006 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.820(a)(7), Subpart KK

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

A printing and publishing facility that has the potential to emit (PTE) HAP emissions above any of the Major Source thresholds may establish area source status by limiting its PTE through permit conditions. Emissions from the facility will be determined and recorded on a monthly basis. Compliance with the PTE limit must be maintained during every rolling 12 month period after the limit is established.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 02/21/2007 for the period 01/23/2006 through 01/22/2007

Condition 11: Compliance Demonstration
Effective between the dates of 01/23/2006 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.830(b)(1), Subpart KK

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to this subpart shall submit the reports specified below to the Administrator:

(1) An initial notification required in Sec. 63.9(b).

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

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

(iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under Sec. 63.9(b), provided the same information is contained in the permit



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application as required by Sec. 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Condition 1-25: Compliance Demonstration

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(v)

Item 1-25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-7USTS

Item 1-25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

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Condition 1-26: Compliance Demonstration

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2.5

Item 1-26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

LAER emission limit. Records for demonstration of compliance with the VOC emission limit shall be maintained on site for five years. Any exceedances of the allowable annual VOC emission limitation must be reported in writing to the DEC Regional office within 10 working days of the exceedance.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: VOC's

Upper Permit Limit: 60 tons per year

Monitoring Frequency: ANNUALLY

Averaging Method: ARITHMETIC MEAN

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 02/21/2008 for the period 11/06/2007 through 01/22/2008

Condition 1-27: flexographic printing control requirement

Effective between the dates of 11/06/2007 and Permit Expiration Date

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

Item 1-27.1:

This Condition applies to Emission Unit: 1-PRINT

Item 1-27.2:

Where a flexographic printing process is employed the capture system and air cleaning device must provide for an overall reduction in volatile organic compound emissions of at least 60.0 percent.



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Condition 1-28: Compliance Demonstration

Effective between the dates of 11/06/2007 and Permit Expiration Date

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

Replaces Condition(s) 12

Item 1-28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall ensure proper capture of VOC emissions through monthly inspections and maintenance (where required) of capture equipment.

The facility shall document inspections and maintenance activities in an on-site logbook.

Compliance with this condition shall be certified as part of the facility's annual report.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 14: Compliance Demonstration

Effective between the dates of 01/23/2006 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Item 14.2:

Compliance Demonstration shall include the following monitoring:

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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. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with 234.3(e) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee shall immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations, and corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Reference Test Method: See monitoring description.

Monitoring Frequency: WEEKLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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The initial report is due 1/30/2007.

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

Condition 1-29: control requirement

Effective between the dates of 11/06/2007 and Permit Expiration Date

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

Item 1-29.1:

This Condition applies to Emission Unit: 1-PRINT

Item 1-29.2:

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 1-30: control requirement

Effective between the dates of 11/06/2007 and Permit Expiration Date

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

Item 1-30.1:

This Condition applies to Emission Unit: 1-PRINT

Item 1-30.2:

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings and printing inks are presented in Appendix A, methods 24 and 24A respectively, of 40 CFR 60. Alternate analytical methods for surface coating and printing ink analysis must be approved by the commissioner and the USEPA. Instead of an ink solvent/volatile analysis, the commissioner may accept certification from the ink manufacturer of the composition of the ink solvent/volatiles, if supported by actual batch records.

Condition 15: Compliance Demonstration

Effective between the dates of 01/23/2006 and Permit Expiration Date

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

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

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:

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 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 of 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: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).



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Condition 1-31: sampling

Effective between the dates of 11/06/2007 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.4(b)(4)

Item 1-31.1:

This Condition applies to Emission Unit: 1-PRINT

Item 1-31.2:

The results of any analysis or other procedure used for establishing compliance must be provided to the commissioner's representative. Representatives of the department shall be permitted, during reasonable business hours, to obtain ink and/or fountain solution samples for the purpose of determining compliance with 6NYCRR Part 234.



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

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law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 20: Contaminant List

Effective between the dates of 01/23/2006 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: 0NY100-00-0

Name: HAP

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0

Name: VOC

Condition 21: Unavoidable noncompliance and violations

Effective between the dates of 01/23/2006 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.



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(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 superseded 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 01/23/2006 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: 0-7USTS

Emission Unit Description:

This Emission Unit consists of the following seven (7) underground storage tanks. Six tanks are used to store solvents. The seventh tank is used for spill containment.

Tank #1 - 6,000 gallons Blend 80/20

Tank #2 - 6,000 gallons Blend 80/20

Tank(s) #3, #4, & #5 - 6,000 gallons total (3 2,000 gallons compartments)

Tank #3 - 2,000 gallons Alcan Blend AL-SS

Tank #4 - 2,000 gallons Blend 80/20

Tank #5 - 2,000 gallons Alcan Blend AL-SS



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Tank #6 - 6,000 gallons Alcan Blend AL-SS

Tank #7 - 6,000 gallons spill containment

Building(s): PLANT

Item 22.2(From Mod 1):

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

Emission Unit: 1-PRINT

Emission Unit Description:

Multiple flexible label production lines (flexographic presses), ink jet imprinters, and seaming/forming machines located within permanent total enclosure(s).

VOC emissions from these sources are sent to (initially one, but eventually) three VOC oxidizers connected in a triplex arrangement. When the second oxidizer is installed and is operational, VOC emissions from graphics equipment and parts washers will be sent to the VOC oxidizers for control.

Building(s): PLANT

**Condition 23: General Conditions - Synthetic Minor Facilities Obtaining State Facility Permits
Effective between the dates of 01/23/2006 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 201-5.1(a)(1)

Item 23.1:

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

Item 23.2:

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 23.3:

On an annual basis, 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 those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Item 23.4:

The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility



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permit or other applicable requirements constitutes a violation of Part 201 and of the Act.

Condition 24: Air pollution prohibited
Effective between the dates of 01/23/2006 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 24.1:

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 25: Emission Point Definition By Emission Unit
Effective between the dates of 01/23/2006 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 25.1(From Mod 1):

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

Emission Unit: 0-7USTS			
Emission Point: 000T1	Height (ft.): 8	Diameter (in.): 2	Building: PLANT
Emission Point: 000T2	Height (ft.): 8	Diameter (in.): 2	Building: PLANT
Emission Point: 000T3	Height (ft.): 8	Diameter (in.): 2	Building: PLANT
Emission Point: 000T4	Height (ft.): 8	Diameter (in.): 2	Building: PLANT
Emission Point: 000T5	Height (ft.): 8	Diameter (in.): 2	



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Building: PLANT

Emission Point: 000T6
Height (ft.): 8

Diameter (in.): 2

Building: PLANT

Emission Point: 000T7
Height (ft.): 8

Diameter (in.): 2

Building: PLANT

Item 25.2(From Mod 1):

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

Emission Unit: 1-PRINT

Emission Point: 00001
Height (ft.): 52

Diameter (in.): 52

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Emission Point: 00002
Height (ft.): 52

Length (in.): 42

Width (in.): 76

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Emission Point: 00003
Height (ft.): 44

Diameter (in.): 3

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Emission Point: 00004
Height (ft.): 45

Diameter (in.): 12

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Emission Point: 00005
Height (ft.): 12

Diameter (in.): 24

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Emission Point: 00006
Height (ft.): 68

Diameter (in.): 62

NYTMN (km.): 4515.441 NYTME (km.): 644.264 Building: PLANT

Condition 26: Process Definition By Emission Unit

Effective between the dates of 01/23/2006 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 26.1(From Mod 1):

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



New York State Department of Environmental Conservation

Permit ID: 1-4728-04190/00003

Facility DEC ID: 1472804190

Emission Unit: 0-7USTS

Process: TNK

Source Classification Code: 4-05-007-01

Process Description:

This emission unit (0-7USTS) addresses the insignificant emissions generated from the loading and storage of solvents in six (6) underground storage tanks and spill containment liquid in one (1) underground storage tank.

Emission Source/Control: 0UST1 - Process

Design Capacity: 6,000 gallons

Emission Source/Control: 0UST2 - Process

Design Capacity: 6,000 gallons

Emission Source/Control: 0UST3 - Process

Design Capacity: 2,000 gallons

Emission Source/Control: 0UST4 - Process

Design Capacity: 2,000 gallons

Emission Source/Control: 0UST5 - Process

Design Capacity: 2,000 gallons

Emission Source/Control: 0UST6 - Process

Design Capacity: 6,000 gallons

Emission Source/Control: 0UST7 - Process

Design Capacity: 6,000 gallons

Item 26.2(From Mod 1):

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

Emission Unit: 1-PRINT

Process: 128

Source Classification Code: 4-05-003-01

Process Description:

Four CI flexographic printing lines, two ink jet printing units, flexographic plate-making process, and seaming/forming machines. The flexographic printing lines will have up to 10-color CI capability, downstream (in-line) coater/laminator capability, and back-side printing capability. VOC emissions from this process will be captured in a permanent total enclosure and sent to the oxidizers for control. Normal full operation will consist of two regenerative thermal oxidizers (RTOs) (OXID2 and OXID3). The catalytic oxidizer (OXID1) will be brought into service if one of the RTOs is off-line or if it is determined that the two RTOs do not provide sufficient



New York State Department of Environmental Conservation

Permit ID: 1-4728-04190/00003

Facility DEC ID: 1472804190

capacity to handle the total flow from all four presses and ancillary equipment.

Emission Source/Control: OXID1 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: OXID2 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: OXID3 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: INKJ2 - Process

Emission Source/Control: INKJT - Process

Emission Source/Control: PRES2 - Process

Emission Source/Control: PRESS - Process

Emission Source/Control: SEAM2 - Process

Emission Source/Control: SEAMG - Process

Item 26.3(From Mod 1):

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

Emission Unit: 1-PRINT

Process: 129

Source Classification Code: 4-05-005-97

Process Description:

Flexographic plate-making process employing low-emitting organic wash/cleaning materials. VOC emissions from this process will be captured and sent to the oxidizers for control. This process covers flexographic plate making operations.

Emission Source/Control: OXID1 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: OXID2 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: OXID3 - Control
Control Type: THERMAL OXIDATION

New York State Department of Environmental Conservation

Permit ID: 1-4728-04190/00003

Facility DEC ID: 1472804190



Emission Source/Control: GRAP2 - Process

Emission Source/Control: GRAPH - Process

Item 26.4(From Mod 1):

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

Emission Unit: 1-PRINT

Process: 131

Source Classification Code: 4-01-002-96

Process Description:

Non-vapor phase parts washer that uses only organic solvents with an initial boiling point greater or equal to 300 degrees F at atmospheric pressure and a vapor pressure less than 1.00 mm Hg at 20 degrees C. The powered exhaust from the washer and fugitive VOC emissions from the parts washer room are ducted to the oxidizers for control. This process covers the parts washing operation.

Emission Source/Control: OXID1 - Control

Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: OXID2 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: OXID3 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: CLEAN - Process

Design Capacity: 185 gallons