



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 3-3924-00173/00010
Effective Date: 03/11/2008 Expiration Date: 03/10/2013

Permit Issued To: AVERY DENNISON OFFICE PRODUCTS COMPANY
524 ST RTE 303
ORANGEBURG, NY 10962

Contact: TONY HARB
AVERY DENNISON INFORMATION AND BRAND MNGT DIV
524 ST RTE 303
ORANGEBURG, NY 10962
(845) 359-4100

Facility: AVERY DENNISON INFORMATION AND BRAND MGMT DIV
524 ST RTE 303
ORANGEBURG, NY 10962

Description:

This facility (formerly named Paxar Corporation) is an urethane-based fabric coating plant involving the formulation and application of surface coatings. It consists of three coating lines each containing several emission sources such as ovens and coating stations. Additional equipment includes reactors, mixing units, storage vessels, and a thermal oxidizer for controlling emissions. The facility is a major source for volatile organic compounds (VOCs) and hazardous pollutants and is required to meet MACT standards for Fabric Printing, Coating & dyeing sources as regulated by 40 C.F.R. Part 63 Subpart OOOO.

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: KENNETH R GRZYB
NYSDEC REGION 3
21 SOUTH PUTT CORNERS RD
NEW PALTZ, NY 12561

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6NYCRR 621.11

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

Item 4.1:

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 4.2:

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 4.3:

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 5: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 5.1:

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

Item 6.1:

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

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



permitted activity.

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

Condition 7: Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.6(a)

Item 7.1:

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

NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054

New York State Department of Environmental Conservation

Permit ID: 3-3924-00173/00010

Facility DEC ID: 3392400173



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: AVERY DENNISON OFFICE PRODUCTS COMPANY
524 ST RTE 303
ORANGEBURG, NY 10962

Facility: AVERY DENNISON INFORMATION AND BRAND MGMT DIV
524 ST RTE 303
ORANGEBURG, NY 10962

Authorized Activity By Standard Industrial Classification Code:
2672 - PAPER COATED AND LAMINATED, NEC

Permit Effective Date: 03/11/2008

Permit Expiration Date: 03/10/2013



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 application for permit modification or renewal-REGION 3 HEADQUARTERS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 24 6NYCRR 201-6.5(g): Non Applicable requirements
- 25 6NYCRR 212.4(c): Compliance Certification
- 26 6NYCRR 228.3(c): Compliance Certification
- 27 6NYCRR 228.4: Compliance Certification
- 28 6NYCRR 228.5(a): Compliance Certification
- 29 6NYCRR 228.5(g): Compliance Certification
- 30 6NYCRR 228.10: Compliance Certification
- 31 40CFR 63.4311(a), Subpart OOOO: Compliance Certification
- 32 40CFR 63.4312, Subpart OOOO: Compliance Certification



- 33 40CFR 63.4313, Subpart OOOO: Compliance Certification
Emission Unit Level
- 34 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 35 6NYCRR 201-6: Process Definition By Emission Unit
- 36 6NYCRR 201-7: Emission Unit Permissible Emissions
- 37 40CFR 63.4290, Subpart OOOO: Compliance Certification
- 38 40CFR 63.4291(a), Subpart OOOO: Compliance Certification
- 39 40CFR 63.4292(b), Subpart OOOO: Compliance Certification
- 40 40CFR 63.4293(b), Subpart OOOO: Compliance Certification

EU=2-00000

- 41 6NYCRR 228.3(a): Compliance Certification
- 42 40CFR 63.4291(a), Subpart OOOO: Compliance Certification

EU=5-00000

- *43 6NYCRR 201-7: Capping Monitoring Condition

EU=5-00000,Proc=P10

- 44 6NYCRR 228.3(a): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 45 ECL 19-0301: Contaminant List
- 46 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 47 6NYCRR 211.2: Air pollution prohibited

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

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

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

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

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)



If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the



effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.



(ii) The date(s) analyses were performed;

(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 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 03/11/2008 and 03/10/2013

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

Item 4.1:

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 5: Compliance Certification

Effective between the dates of 03/11/2008 and 03/10/2013

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification 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 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 or a toxic 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 any of the above conditions 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) through (4) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill 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 paragraph (1) through (4) of this section must also be identified in the 6 month monitoring report required above.



If the permittee seeks to have a violation excused as provided in 201-1.4, the permittee shall report such violations as required under 201-1.4(b). However, in no case may reports of any deviation be on a less frequent basis than those described in paragraphs (1) through (4) above. 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.

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 Compliance Monitoring and Enforcement (BCME) 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.

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 7/30/2008.

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

Condition 6: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.



Item 6.2:

Compliance Certification 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 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 Compliance Monitoring and Enforcement (BCME) 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:

21 South Putt Corners Road
New Paltz, NY 12561-1696

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring
and Enforcement
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification 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 8: Recordkeeping requirements
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 202-2.5

Item 8.1:



(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 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 03/11/2008 and 03/10/2013**

Applicable Federal Requirement:6NYCRR 215

Item 9.1:

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

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

**Condition 10: Maintenance of Equipment
Effective between the dates of 03/11/2008 and 03/10/2013**

Applicable Federal Requirement:6NYCRR 200.7

Item 10.1:

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

**Condition 11: Recycling and Salvage
Effective between the dates of 03/11/2008 and 03/10/2013**

Applicable Federal Requirement:6NYCRR 201-1.7

Item 11.1:

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

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to
the air**



Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 03/11/2008 and 03/10/2013

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

Item 13.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. 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 this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 03/11/2008 and 03/10/2013

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

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. 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 this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 15: Standard Requirement - Provide Information
Effective between the dates of 03/11/2008 and 03/10/2013

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

Item 15.1:

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 16: General Condition - Right to Inspect
Effective between the dates of 03/11/2008 and 03/10/2013



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 22: Recycling and Emissions Reduction
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:40CFR 82, Subpart F

Item 22.1:

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

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 23: Emission Unit Definition
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 201-6

Item 23.1:

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

Emission Unit: 1-00000

Emission Unit Description:

Solvent and water-based coating formulation and solvent-based coating application. The unit consists of three processes (p02, p03, and p04), eighteen sources (00107-00109, 00111-00116, 00118-00127), two control devices (00101, 00117), and one emission point (0001A).

Building(s): MAIN

Item 23.2:

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

Emission Unit: 2-00000

Emission Unit Description:

Water-based coating application and compliant coating application. Includes E line with coating stations and ovens. The unit consists of one process (p06), four emission sources (00201-00204), and five emission points (00005-00009).

Building(s): MAIN



Item 23.3:

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

Emission Unit: 3-00000

Emission Unit Description:

Unit consists of raw material storage. Unit includes 3 underground storage tanks (one tank is exempt).

Building(s): MAIN

Item 23.4:

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

Emission Unit: 5-00000

Emission Unit Description:

Solvent and water-based coating application. The unit consists of two processes (p05 and p10), five emission points (0002a, and 50001-50004), one control device (00506) and five emission sources (00501-00505).

Building(s): MAIN

Condition 24: Non Applicable requirements
Effective between the dates of 03/11/2008 and 03/10/2013

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

Item 24.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

Condition 25: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 212.4(c)

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.



The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site.

Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

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 7/30/2008.

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

Condition 26: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 228.3(c)

Item 26.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-00000

Emission Unit: 5-00000

Process: P05



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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions when the process is in operation. If any visible emissions are identified, corrective action is required. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 28: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 228.5(a)

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the Department and, upon request, these records must be submitted to the Department. Any facility required to perform the overall removal efficiency calculation , must maintain records to verify



the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance must be provided to the Department in a format acceptable to the Department.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 29: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 228.5(g)

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 29.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The Thermal Oxider will be preheated to 1400 degrees fahrenheit prior to introduction of VOC. The three-hour average exhaust temperature shall not fall below 1400 degrees fahrenheit.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

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 7/30/2008.

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

Condition 30: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 228.10

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):



CAS No: 0NY998-00-0 VOC

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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



Monitoring Frequency: DAILY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 31: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:40CFR 63.4311(a), Subpart OOOO

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The facility must submit semiannual compliance reports for each affected source according to the requirements in §63.4311(a)(3)-(8) by the dates specified in §63.4311(a)(1). The semiannual compliance reporting requirements of this condition may be satisfied by reports required under the Title V program, as specified in §63.4311(a)(2).

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 7/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:40CFR 63.4312, Subpart OOOO

Item 32.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:



The facility must collect and keep a record of the following data and information:

- 1) A copy of each notification and report that was submitted to comply with this subpart, and the documentation supporting each notification and report.
- 2) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data or test data used to determine the mass fraction of organic HAP for coating, printing, slashing, dyeing, finishing, thinning, and cleaning materials; and the mass fraction of solids for coating and printing materials. If the facility conducted testing to determine mass fraction of organic HAP of coating materials or the mass fraction of solids of coating materials, the facility must keep a copy of the complete test report. If the facility uses information provided to the facility by the manufacturer or supplier of the material that was based on testing, the facility must keep the summary sheet of results provided to the facility by the manufacturer or supplier. The facility is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
- 3) For each compliance period, the records specified in §63.4312(c)(1) for web coating/printing operations and §63.4312(c)(2) for dyeing/finishing operations.
- 4) A record of the name and mass of each regulated material applied in the web coating and printing subcategory and the dyeing and finishing subcategory during each compliance period. If the facility is using the compliant material option for all regulated materials at the source, the facility may maintain purchase records for each material used rather than a record of the mass used.
- 5) A record of the mass fraction of organic HAP for each regulated material applied during each compliance period.
- 6) A record of the mass fraction of coating and printing solids for each coating and printing material applied during each compliance period.
- 7) The information listed in §63.4312(g)(1)-(3) if the facility uses an allowance in equation 1 or 4 of §63.4331 for organic HAP contained in waste materials sent to, or designated for shipment to, a TSDF.
- 8) The information listed in §63.4312(h)(1) and (2) if the



facility uses an allowance in equation 4 for organic HAP contained in wastewater discharged to a POTW or treated onsite prior to discharge.

9) Records of the date, time, and duration of each deviation.

10) The information listed in §63.4312(j)(1)-(8) if the facility uses the emission rate with add-on control option, the organic HAP overall control efficiency option, or the oxidizer outlet organic HAP concentration option.

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 7/30/2008.

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

Condition 33: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:40CFR 63.4313, Subpart OOOO

Item 33.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility's records must be kept in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

As specified in §63.10(b)(1), the facility must keep each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

The facility must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The facility may keep records off site for the remaining 3 years.

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 7/30/2008.

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

**** Emission Unit Level ****

Condition 34: Emission Point Definition By Emission Unit
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 201-6

Item 34.1:

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

Emission Unit: 1-00000

Emission Point: 0001A

Height (ft.): 34 Diameter (in.): 42
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Item 34.2:

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

Emission Unit: 2-00000

Emission Point: 00005

Height (ft.): 26 Length (in.): 22 Width (in.): 22
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Emission Point: 00006

Height (ft.): 26 Length (in.): 22 Width (in.): 22
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Emission Point: 00007

Height (ft.): 26 Length (in.): 22 Width (in.): 22
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Emission Point: 00008

Height (ft.): 26 Length (in.): 22 Width (in.): 22
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Emission Point: 00009

Height (ft.): 22 Diameter (in.): 18
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Item 34.3:

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

Emission Unit: 3-00000



Emission Point: 30003
Height (ft.): 0 Diameter (in.): 8
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Item 34.4:

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

Emission Unit: 5-00000

Emission Point: 0002A	Height (ft.): 20	Diameter (in.): 12	Building: MAIN
Emission Point: 50001	Height (ft.): 26	Diameter (in.): 28	Building: MAIN
Emission Point: 50002	Height (ft.): 19	Diameter (in.): 12	Building: MAIN
Emission Point: 50003	Height (ft.): 25	Diameter (in.): 16	Building: MAIN
Emission Point: 50004	Height (ft.): 25	Diameter (in.): 16	Building: MAIN

Condition 35: Process Definition By Emission Unit
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 201-6

Item 35.1:

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

Emission Unit: 1-00000
Process: P02 Source Classification Code: 4-02-023-04
Process Description:
Process consists of three intermediate storage tanks.
The emissions from the tanks are vented to the thermal oxidizer.

Emission Source/Control: 00101 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00107 - Process

Emission Source/Control: 00108 - Process

Emission Source/Control: 00109 - Process



Item 35.2:

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

Emission Unit: 1-00000

Process: P03

Source Classification Code: 4-02-008-03

Process Description:

Process consists of c-line emissions. The line utilizes solvent-based coatings, and the emissions from the line are sent to the thermal oxidizer

Emission Source/Control: 00101 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 00111 - Process

Emission Source/Control: 00112 - Process

Emission Source/Control: 00113 - Process

Emission Source/Control: 00114 - Process

Emission Source/Control: 00115 - Process

Emission Source/Control: 00116 - Process

Item 35.3:

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

Emission Unit: 1-00000

Process: P04

Source Classification Code: 4-02-042-21

Process Description:

The process consists of five mixing vessels and two coating storage tanks used in the formulation of the coatings. The emissions from the vessels are sent to a baghouse for particulate control and then to the thermal oxidizer.

Emission Source/Control: 00101 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 00117 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00118 - Process

Emission Source/Control: 00119 - Process

Emission Source/Control: 00120 - Process

Emission Source/Control: 00124 - Process



Emission Source/Control: 00125 - Process

Emission Source/Control: 00126 - Process

Emission Source/Control: 00127 - Process

Item 35.4:

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

Emission Unit: 2-00000

Process: P06

Source Classification Code: 4-02-008-03

Process Description:

Process consists of the e-line coating process. The process utilizes water based coatings and compliant coatings.

Emission Source/Control: 00201 - Process

Emission Source/Control: 00202 - Process

Emission Source/Control: 00203 - Process

Emission Source/Control: 00204 - Process

Item 35.5:

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

Emission Unit: 3-00000

Process: P09

Source Classification Code: 4-02-999-95

Process Description:

Process consists of 3 underground tanks used for the storage of coating reactants (one tank is exempt).

Emission Source/Control: 00308 - Control

Control Type: VAPOR RECOVERY SYS(INCL.

CONDENSERS,HOODING, OTHER ENCLOSURES)

Emission Source/Control: 00311 - Control

Control Type: CONSERVATION VENT

Emission Source/Control: 00303 - Process

Design Capacity: 10,000 gallons

Emission Source/Control: 00310 - Process

Design Capacity: 10,000 gallons

Item 35.6:

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

Emission Unit: 5-00000

Process: P05

Source Classification Code: 4-02-008-03

Process Description:



Process consists of the d-line coating process. The process uses solvent-based coatings. The emissions from the line are sent to a thermal oxidizer.

Emission Source/Control: 00506 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00501 - Process

Emission Source/Control: 00502 - Process

Emission Source/Control: 00503 - Process

Emission Source/Control: 00504 - Process

Emission Source/Control: 00505 - Process

Item 35.7:

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

Emission Unit: 5-00000

Process: P10

Source Classification Code: 4-02-008-03

Process Description:

Process consists of the d-line coatings process using water-based and compliant coatings emitting through four emission points (50001-50004).

Emission Source/Control: 00501 - Process

Emission Source/Control: 00502 - Process

Emission Source/Control: 00503 - Process

Emission Source/Control: 00504 - Process

Emission Source/Control: 00505 - Process

Condition 36: Emission Unit Permissible Emissions

Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 201-7

Item 36.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 5-00000

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 49,000 pounds per year

Condition 37: Compliance Certification



Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:40CFR 63.4290, Subpart OOOO

Item 37.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 1-00000
Process: P02

Emission Unit: 1-00000
Process: P03

Emission Unit: 1-00000
Process: P04

Emission Unit: 5-00000
Process: P05

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility operates an existing coating and printing affected source then the facility must reduce organic HAP emissions to the atmosphere by achieving at least a 97% organic HAP overall control efficiency.

The facility shall meet the requirements in §63.4291(a)(4) in order to demonstrate compliance with this emission reduction limit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 38: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:40CFR 63.4291(a), Subpart OOOO

Item 38.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 1-00000
Process: P02



Emission Unit: 1-00000
Process: P03

Emission Unit: 1-00000
Process: P04

Emission Unit: 5-00000
Process: P05

Regulated Contaminant(s):
CAS No: ONY100-00-0 HAP

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must include all regulated materials (as defined in §63.4371) used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.4290.

To make this determination, the facility must use one of the options listed in §63.4291(a)(1)-(5) for web coating and printing operations.

One option is for the facility to demonstrate that, based on the organic HAP emission capture and add-on control efficiencies achieved, the organic HAP overall control efficiency is greater than or equal to the applicable organic HAP overall control efficiency limit in table 1 of subpart OOOO. If the facility uses this option, the facility must also demonstrate that all capture systems and control devices for the web coating/printing operating(s) meet the operating limits required in §63.4292, except for solvent recovery systems for which the facility conducts liquid-liquid material balances according to §63.4351(d)(5), and that the facility meets the work practice standards required in §63.4293. The facility must meet all the requirements of §63.4350-4352 and 63.4360-4364 to demonstrate compliance with the applicable emission limits, operating, limits, and work practice standards using this option.

Averaging Method: 12-month rolling average
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 39: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013



Applicable Federal Requirement: 40CFR 63.4292(b), Subpart OOOO

Item 39.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-00000

Process: P02

Emission Unit: 1-00000

Process: P03

Emission Unit: 1-00000

Process: P04

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 39.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

If the facility uses a thermal oxidizer in order to comply with the emission rate with add-on controls option, the organic HAP overall removal efficiency option, or the outlet organic HAP concentration option, then the facility must not allow the average temperature in any 3-hour block period to fall below the temperature limit established during the performance test according to §63.4363(a).

Compliance will be continuously determined by:

- i) Collecting the temperature data according to the provisions in §63.4364(c)
- ii) Reducing the data to 3-hour block averages; and
- iii) Maintaining the 3-hour block average temperature at or above the temperature limit.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1560 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 40: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013



Applicable Federal Requirement: 40CFR 63.4293(b), Subpart OOOO

Item 40.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-00000

Process: P02

Emission Unit: 1-00000

Process: P03

Emission Unit: 1-00000

Process: P04

Emission Unit: 5-00000

Process: P05

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of regulated materials used in, and waste materials generated by, the coating/printing or dyeing/finishing operations for which the facility uses this option; or the facility must meet an alternative standard as provided in §63.4293(c).

The work practice plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

- 1) All organic-HAP containing regulated materials and waste materials must be stored in closed containers.
- 2) Spills of organic-HAP-containing regulated materials, and waste materials must be minimized.
- 3) Organic-HAP-containing regulated materials and waste materials must be conveyed from one location to another in closed containers or pipes.
- 4) Mixing vessels which contain organic-HAP-containing regulated materials must be closed except when adding to, removing, or mixing the contents.
- 5) Emissions of organic HAP must be minimized during



cleaning of web coating/printing or dyeing/finishing
storage, mixing, and conveying equipment.

Monitoring Frequency: SINGLE OCCURRENCE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 228.3(a)

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00000

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

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility will comply using a mass balance approach to
keep the VOC content below 2.9 lbs VOC/Gal. VOCs will be
determined for the appropriate coatings on a batch- by-
batch basis.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 42: Compliance Certification
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:40CFR 63.4291(a), Subpart OOOO

Item 42.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 2-00000
Process: P06

Emission Unit: 5-00000
Process: P10



Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must include all regulated materials (as defined in §63.4371) used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.4290.

To make this determination, the facility must use one of the options listed in §63.4291(a)(1)-(5) for web coating and printing operations.

One option is for the facility to demonstrate that the organic HAP content, as purchased, of each coating and printing material applied in the web coating/printing operation(s) is less than or equal to the applicable emission limit in Table 1 of subpart OOOO, and that each thinning and cleaning material is purchased contains no organic HAP (as defined in §63.4371). The facility must meet all the requirements of §63.4320, 63.4321, and 63.4322 to demonstrate compliance with the applicable emission limit using this option.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 43: Capping Monitoring Condition

Effective between the dates of 03/11/2008 and 03/10/2013

Applicable Federal Requirement:6NYCRR 201-7

Item 43.1:

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 43.2:

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

Item 43.3:

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 43.4:

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 43.5:

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 43.6:

The Compliance Certification activity will be performed for:

Emission Unit: 5-00000

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 43.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility is capping the potential to emit VOC from coating line D to below 24.5 tpy to stay below Part 231 new Source review and PSD thresholds. The thermal oxidizer will be operated at all times that coating line is utilizing non-compliant solvent based coatings. The thermal oxidizer shall provide for at least an 85% overall removal efficiency of VOC. The thermal oxidizer will be preheated to 1400 degrees Fahrenheit prior to introduction of VOC. Compliance with the cap will be determined from coating usage, VOC content of coatings and 85% overall removal efficiency of the thermal oxidizer, when solvent based coatings are used and determined from coating usage and VOC content of compliant coatings.

Parameter Monitored: VOC

Upper Permit Limit: 24.5 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: ANNUAL MINIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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



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: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

**Condition 45: Contaminant List
Effective between the dates of 03/11/2008 and 03/10/2013**

Applicable State Requirement:ECL 19-0301

Item 45.1:

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: 0NY075-00-0



Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

Condition 46: Unavoidable noncompliance and violations
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable State Requirement:6NYCRR 201-1.4

Item 46.1:

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

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

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

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

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



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

Condition 47: Air pollution prohibited
Effective between the dates of 03/11/2008 and 03/10/2013

Applicable State Requirement:6NYCRR 211.2

Item 47.1:

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.

New York State Department of Environmental Conservation

Permit ID: 3-3924-00173/00010

Facility DEC ID: 3392400173

