



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-5148-00136/02002
Mod 0 Effective Date: 06/25/2013 Expiration Date: 06/24/2023
Mod 1 Effective Date: 10/02/2013 Expiration Date: 06/24/2023

Permit Issued To: DELUXE PACKAGING CORP
63 NORTH ST
PO BOX 269
SAUGERTIES, NY 12477-0269

Contact: LUC CHOUINARD
DE LUXE GROUP CORPORATION
200 AVENUE MARIEN
MONTREAL, QC H1B 4V2
(845) 246-6090

Facility: DE LUXE PACKAGING CORPORATION
63 NORTH ST
SAUGERTIES, NY 12477

Contact: LUC CHOUINARD
DE LUXE GROUP CORPORATION
200 AVENUE MARIEN
MONTREAL, QC H1B 4V2
(845) 246-6090

Description:

De Luxe Packaging Corporation is located in Saugerties, Ulster County, New York. The facility produces food packaging products by means of printing and coating on paper and foil substrates. The facility operates two flexographic printing presses and one combination laminator / rotogravure printing press. Both aqueous and solvent based solutions are used at the facility. The operation of a regenerative thermal oxidizer provides the control of Volatile Organic Compound (VOC) associated with the use of solvent based solutions.

The facility is subject to the monitoring, reporting and recordkeeping requirements of 6NYCRR Part 234 and 6NYCRR Part 201. Facility emissions of Volatile Organic Compounds have been capped below major stationary source thresholds defined by 6 NYCRR Part 201. The Standard Industrial Classification representative of this facility is 2759 - Commercial Printing.

Modification 1

Determination to remove Part 228 surface coating process conditions associated with the combination laminator / rotogravure printer. The permit modification realigns emission unit, process and source associations and incorporates Part 234 specific requirements for low VOC material usage as well capture system and control equipment providing overall removal



efficiency.

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: GEORGE A SWEIKERT
 NYSDEC
 21 S PUTT CORNERS RD
 NEW PALTZ, NY 12561-1696

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
- Permit modifications, suspensions or revocations by the Department

Facility Level

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



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

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

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

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: 3-5148-00136/02002

Facility DEC ID: 3514800136



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: DELUXE PACKAGING CORP
63 NORTH ST
PO BOX 269
SAUGERTIES, NY 12477-0269

Facility: DE LUXE PACKAGING CORPORATION
63 NORTH ST
SAUGERTIES, NY 12477

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

Mod 0 Permit Effective Date: 06/25/2013

Permit Expiration Date: 06/24/2023

Mod 1 Permit Effective Date: 10/02/2013

Permit Expiration Date: 06/24/2023



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 4 6 NYCRR 211.1: Air pollution prohibited
- 1-1 6 NYCRR 234.3 (a) (1) (i): Compliance Demonstration
- 1-2 6 NYCRR 234.3 (a) (1) (ii) ('e'): Compliance Demonstration
- 1-3 6 NYCRR 234.4 (b): Compliance Demonstration
- 15 6 NYCRR 234.4 (c): Compliance Demonstration
- 1-4 6 NYCRR 234.6: Compliance Demonstration
- 1-5 6 NYCRR 234.7: Compliance Demonstration
- 1-6 6 NYCRR 234.8: Compliance Demonstration

Emission Unit Level

EU=U-00001

- 1-7 6 NYCRR 234.1 (c): Once in, always in

EU=U-00002

- 1-8 6 NYCRR 234.1 (c): Once in, always in

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 19 ECL 19-0301: Contaminant List
- 20 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 21 6 NYCRR Subpart 201-5: Emission Unit Definition
- 22 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 23 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 24 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 25 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 26 6 NYCRR Subpart 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 - 6 NYCRR 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 - 6 NYCRR 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 - 6 NYCRR 200.7

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



required to operate such device effectively.

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR 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 - 6 NYCRR 201-1.5

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

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

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

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



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

Item F: Recycling and Salvage - 6 NYCRR 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 - 6 NYCRR 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 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 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item J: Required Emission Tests - 6 NYCRR 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 6 NYCRR Subpart 202-1.

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

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.

Item M: 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: Facility Permissible Emissions



Effective between the dates of 06/25/2013 and 06/24/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1.1:

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

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

per year	CAS No: 0NY100-00-0 (From Mod 1)	PTE: 49,000 pounds
	Name: TOTAL HAP	
per year	CAS No: 0NY998-00-0 (From Mod 1)	PTE: 95,000 pounds
	Name: VOC	

Condition 2: Capping Monitoring Condition
Effective between the dates of 06/25/2013 and 06/24/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2.1:

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:

- 6 NYCRR Subpart 201-6
- 40 CFR 63.829 (d)

Item 2.2:

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

Item 2.3:

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 2.4:

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 2.5:

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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 2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

De Luxe Packaging Corporation shall demonstrate that its emissions are below 10 tons per year of any individual HAP and below 25 tons per year of total HAPs based on a 12-month rolling average.

To demonstrate that this facility will continue to be a minor of HAP, De Luxe Packaging Corporation shall maintain records of all required measurements and emissions calculations of individual HAP and total HAPs from all activities at the facility. These records shall be kept on a monthly basis, and shall include mass of all HAP-containing materials used during the month, and the mass fraction of HAP present in each HAP-containing material used.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 49000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 3: Capping Monitoring Condition

Effective between the dates of 06/25/2013 and 06/24/2023

Applicable Federal Requirement:6 NYCRR Subpart 201-7



Item 3.1:

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:

6 NYCRR Subpart 201-6

Item 3.2:

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

Item 3.3:

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 3.4:

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 3.5:

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 3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

De Luxe Packaging Corporation shall not emit in excess of 95,000 pounds of volatile organic compounds (VOCs) per year based on a rolling 12 month total.

De Luxe Packaging Corporation shall maintain records of the VOCs emitted monthly based on amount of inks, coatings

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and solvents used, manufacturer's reported contents of VOCs in these products and by applying the overall control efficiency. Records must include VOCs in tons per year for the previous consecutive twelve months.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: VOC

Upper Permit Limit: 95000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 4: Air pollution prohibited
Effective between the dates of 06/25/2013 and 06/24/2023

Applicable Federal Requirement:6 NYCRR 211.1

Item 4.1:

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.

Condition 1-1: Compliance Demonstration
Effective between the dates of 10/02/2013 and 06/24/2023

Applicable Federal Requirement:6 NYCRR 234.3 (a) (1) (i)

Replaces Condition(s) 12

Item 1-1.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00001

Emission Point: P0487

Process: 001

Emission Unit: U-00002

Emission Point: BMBAQ

Process: AQS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-1.2:

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Flexographic and rotogravure printing process that uses ink, coating or adhesive containing VOC shall not operate unless the printing process uses an ink, coating or adhesive with low VOC content equal to or less than 0.16 kilogram of VOC per kilogram as applied.

VOC content limits can be met by averaging the VOC content of materials used on a single press (i.e., within a line).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: VOC

Upper Permit Limit: 0.16 kilograms VOC per kilogram as applied

Reference Test Method: Methods 24 and 24A

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-2: Compliance Demonstration

Effective between the dates of 10/02/2013 and 06/24/2023

Applicable Federal Requirement: 6 NYCRR 234.3 (a) (1) (ii) ('e')

Replaces Condition(s) 13

Item 1-2.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00002
Process: VC1

Emission Point: PORTO
Emission Source: BMBLM

Emission Unit: U-00002
Process: VOC

Emission Point: PORTO
Emission Source: S0486

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

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

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

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Monitoring Description:

This condition applies to the operation of flexographic printing press S0486 and combination laminator / rotogravure press BMBLM utilizing ink, coating or adhesive containing VOC above 0.16 kg per kg of material applied.

De Luxe Packaging shall operate a capture system and control equipment that provides for overall removal efficiency of at least 80 percent. Both the printing press S0486 and combination unit BMBLM shall be operated within enclosed areas meeting the criteria of a permanent or temporary enclosure in accordance with EPA Method 204. To ensure proper destruction, collected vapors from each unit shall be routed to the thermal oxidizer operated at a temperature at or above 1460 F.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1460 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-3: Compliance Demonstration

Effective between the dates of 10/02/2013 and 06/24/2023

Applicable Federal Requirement: 6 NYCRR 234.4 (b)

Replaces Condition(s) 14

Item 1-3.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00001

Emission Unit: U-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Acceptable analytical methods for determining the VOC content, water content, density, volume of solids and

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weight of solids of surface coatings and printing inks are presented in appendix A, methods 24 and 24A (as appropriate), of 40 CFR 60 (see Table 1, section 200.9 of this Title). Alternate analytical methods for surface coating and printing ink analysis must be approved by the department and the United States Environmental Protection Agency. Instead of analytical methods, the department may accept the manufacturer's certification of VOC content of ink coating or adhesives, if supported by actual batch records.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 06/25/2013 and 06/24/2023

Applicable Federal Requirement: 6 NYCRR 234.4 (c)

Item 15.1:

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

Emission Unit: U-00002

Emission Point: PORTO

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:

De Luxe Packaging shall equip the regenerative thermal oxidizer with a device which continuously monitors combustion zone temperatures. The device shall be periodically calibrated, and functional at all times that the associated control equipment is operated.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 1-4: Compliance Demonstration
Effective between the dates of 10/02/2013 and 06/24/2023



Applicable Federal Requirement:6 NYCRR 234.6

Replaces Condition(s) 16

Item 1-4.1:

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

Emission Unit: U-00001

Emission Unit: U-00002

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

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility subject to this Part shall not:

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

(b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-5: Compliance Demonstration
Effective between the dates of 10/02/2013 and 06/24/2023

Applicable Federal Requirement:6 NYCRR 234.7

Replaces Condition(s) 17

Item 1-5.1:

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

Emission Unit: U-00001



Emission Unit: U-00002

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, use, and production records of ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material must be maintained in a format acceptable to the department, and upon request, submitted to the department. Any other information required to determine compliance with this Part must be provided to the department in an acceptable format. Records must be maintained at the facility for five years.

The results of an analysis or other procedure used to establish compliance with this Part must be provided to the department. Department representatives shall be permitted, during reasonable business hours, to obtain ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-6: Compliance Demonstration
Effective between the dates of 10/02/2013 and 06/24/2023

Applicable Federal Requirement:6 NYCRR 234.8

Replaces Condition(s) 18

Item 1-6.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00001	Emission Point: P0487
Emission Unit: U-00002	Emission Point: BMBAQ
Emission Unit: U-00002	Emission Point: P0486
Emission Unit: U-00002	Emission Point: PORTO

Item 1-6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 3-5148-00136/02002

Facility DEC ID: 3514800136



A person shall not cause or allow emissions having an average opacity of 10 percent or greater for any consecutive six minute period from any emission source subject to this Part into the outdoor atmosphere.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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

Condition 1-7: Once in, always in
Effective between the dates of 10/02/2013 and 06/24/2023

Applicable Federal Requirement:6 NYCRR 234.1 (c)

Item 1-7.1:

This Condition applies to Emission Unit: U-00001

Item 1-7.2:

A printing process that is subject to the provisions of Part 234 will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.

Condition 1-8: Once in, always in
Effective between the dates of 10/02/2013 and 06/24/2023

Applicable Federal Requirement:6 NYCRR 234.1 (c)

Item 1-8.1:

This Condition applies to Emission Unit: U-00002

Item 1-8.2:

A printing process that is subject to the provisions of Part 234 will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.



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 - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 19: Contaminant List
Effective between the dates of 06/25/2013 and 06/24/2023



Applicable State Requirement:ECL 19-0301

Item 19.1:

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: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

**Condition 20: Malfunctions and start-up/shutdown activities
Effective between the dates of 06/25/2013 and 06/24/2023**

Applicable State Requirement:6 NYCRR 201-1.4

Item 20.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, 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 department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that

New York State Department of Environmental Conservation

Permit ID: 3-5148-00136/02002

Facility DEC ID: 3514800136



such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 21: Emission Unit Definition
Effective between the dates of 06/25/2013 and 06/24/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 21.1(From Mod 1):

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

Emission Unit: U-00001

Emission Unit Description:

One low VOC 2-color ink flexographic printer.

Building(s): Main

Item 21.2(From Mod 1):

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

Emission Unit: U-00002

Emission Unit Description:

One flexographic printing press and one combination laminator and rotogravure printer. Emissions are controlled by a regenerative thermal oxidizer when VOC contained within inks and coatings exceed Part 234 limits.

Building(s): Main

Condition 22: Renewal deadlines for state facility permits
Effective between the dates of 06/25/2013 and 06/24/2023

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 22.1:

The owner or operator of a facility having an issued state facility 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.

Condition 23: Compliance Demonstration
Effective between the dates of 06/25/2013 and 06/24/2023

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

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 3-5148-00136/02002

Facility DEC ID: 3514800136



Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 3
21 South Putt Corners Rd.
New Paltz, NY 12561

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2014.
Subsequent reports are due every 12 calendar month(s).

Condition 24: Visible Emissions Limited
Effective between the dates of 06/25/2013 and 06/24/2023

Applicable State Requirement:6 NYCRR 211.2

Item 24.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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

Condition 25: Emission Point Definition By Emission Unit
Effective between the dates of 06/25/2013 and 06/24/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1(From Mod 1):

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

Emission Unit: U-00001

Emission Point: P0487

Height (ft.): 30

Diameter (in.): 28

NYTMN (km.): 4659.7

NYTME (km.): 585.9

Building: Main

Item 25.2(From Mod 1):

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

Emission Unit: U-00002

Emission Point: BMBAQ

Height (ft.): 30

Diameter (in.): 20

NYTMN (km.): 4659.7

NYTME (km.): 585.9

Building: Main



Emission Point: P0486
Height (ft.): 30 Diameter (in.): 28
NYTMN (km.): 4659.7 NYTME (km.): 585.9 Building: Main

Emission Point: PORTO
Height (ft.): 37 Diameter (in.): 28
NYTMN (km.): 4659.7 NYTME (km.): 585.9

Condition 26: Process Definition By Emission Unit
Effective between the dates of 06/25/2013 and 06/24/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 26.1(From Mod 1):

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

Emission Unit: U-00001
Process: 001
Process Description:
2-color ink flexographic printer using low VOC Part 234
compliant inks.

Emission Source/Control: S0487 - Process

Item 26.2(From Mod 1):

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

Emission Unit: U-00002
Process: AQS
Process Description:
BMB laminator / rotogravure printer using low VOC Part
234 compliant inks / coatings.

Emission Source/Control: BMBLM - Process

Item 26.3(From Mod 1):

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

Emission Unit: U-00002
Process: VC1
Process Description:
BMB laminator / rotogravure printer using solvent based
inks and coatings. Emissions are controlled by a
regenerative thermal oxidizer.

Emission Source/Control: S0RTO - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: BMBLM - Process

Item 26.4(From Mod 1):



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

Emission Unit: U-00002

Process: VOC

Process Description:

Flexographic printer using solvent based inks. Emissions are controlled by a regenerative thermal oxidizer.

Emission Source/Control: S0RTO - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: S0486 - Process

