



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 4-4222-00107/00020
Effective Date: 09/16/2010 Expiration Date: No expiration date

Permit Issued To: SEALED AIR CORPORATION
200 RIVERFRONT BLVD
ELMWOOD PARK, NJ 07407

Contact: DAN WILLIAMS
SEALED AIR CORPORATION
100 ROGERS BRIDGE RD - PO BOX 464
DUNCAN, SC 29334-0464
(864) 433-3167

Facility: SEALED AIR CORPORATION
SCOTIA GLENVILLE INDUSTRIAL PARK BLDG 201
SCOTIA, NY 12302

Contact: DAVE BROWN
SEALED AIR CORPORATION
SCOTIA INDUSTRIAL PARK BLDG 201
SCOTIA, NY 12302
(518) 386-0545

Description:

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: NANCY M BAKER
NYSDEC
1130 N WESTCOTT RD
SCHENECTADY, NY 12306-2014

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 or revocations by the Department
 - Permit Modifications, Suspensions and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal -REGION 4 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 4 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.



Applicable State Requirement: 6 NYCRR 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: 6 NYCRR 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 or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

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.



Applicable State Requirement: 6 NYCRR 621.14

Item 7.1:

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 8: Submission of Applications for Permit Modification or Renewal -REGION 4 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.5 (a)

Item 8.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 4 Headquarters
Division of Environmental Permits
1150 North Westcott Rd.
Schenectady, NY 12306-2014
(518) 357-2069

Condition 9: Submission of application for permit modification or renewal-REGION 4 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 9.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 4 Headquarters
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014
(518) 357-2069

New York State Department of Environmental Conservation

Permit ID: 4-4222-00107/00020

Facility DEC ID: 4422200107



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To:SEALED AIR CORPORATION
200 RIVERFRONT BLVD
ELMWOOD PARK, NJ 07407

Facility: SEALED AIR CORPORATION
SCOTIA GLENVILLE INDUSTRIAL PARK BLDG 201
SCOTIA, NY 12302

Authorized Activity By Standard Industrial Classification Code:
3086 - PLASTICS FOAM PRODUCTS

Permit Effective Date: 09/16/2010
date.

Permit Expiration Date: No expiration
date.



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-7.2: Facility Permissible Emissions
- *2 6 NYCRR 201-7.2: Capping Monitoring Condition
- 3 6 NYCRR 212.6 (a): Compliance Demonstration
- 4 6 NYCRR 212.11 (a): Sampling and Monitoring

Emission Unit Level

- 5 6 NYCRR 201-7.2: Emission Unit Permissible Emissions

EU=P-EFOAM

- 6 6 NYCRR 212.3 (a): Compliance Demonstration
- 7 6 NYCRR 212.3 (a): Compliance Demonstration
- 8 6 NYCRR 212.3 (a): Compliance Demonstration
- 9 6 NYCRR 212.3 (a): Compliance Demonstration
- 10 6 NYCRR 212.3 (a): Compliance Demonstration
- 11 6 NYCRR 212.11 (b) (1): Compliance Demonstration

EU=P-EFOAM,Proc=PEF,ES=RTO02

- 12 6 NYCRR 212.6 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 13 ECL 19-0301: Contaminant List
- 14 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 15 6 NYCRR Subpart 201-5: Emission Unit Definition
- 16 6 NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 17 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 18 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: Visible Emissions Limited - 6 NYCRR 211.3

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

Item L: Open Fires 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 M: Permit Exclusion - ECL 19-0305

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

Item N: Federally Enforceable Requirements - 40 CFR 70.6 (b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state



regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Facility Permissible Emissions
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

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:

CAS No: 0NY998-00-0

PTE: 98,000 pounds per year

Name: VOC

Condition 2: Capping Monitoring Condition
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

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 201-6.1 (a)

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:

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: 0NY998-00-0 VOC

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Volatile organic compound (VOC) emissions for the entire facility shall not exceed 98,000 pounds per year for any 12 consecutive month period rolled on a monthly basis.

The emissions shall include those released by the shredder/densifier operation and those resulting from the amount of isobutane and propane, both of which are VOCs, used for the manufacture of product taking into consideration emission factor off-gas rates for the manufactured product.

VOC emissions exhausted into the atmosphere by the regenerative thermal oxidizer (source/control ID: RTO02) shall be determined as follows:

a) The emissions released each month by the shredder/densifier shall be tracked and recorded based upon the unit's hours of operation and its emission rate of 8 pounds/hour. The total pounds of emissions released shall be determined on a monthly and 12 month rolling basis.

b) From the analysis of production records for the 1st quarter of 2001, the facility determined that polyethylene foam product manufacturing operations result in 3 major product categories ; Special Density, Plank, and Cell-Aire. The facility also determined the amount of emissions for each product category that are off-gassed into the Method 204 building type permanent total enclosure (PE) during an initial curing/storage time. The off-gas rates determined are as follows:

Special Density 0.3272 lbs isobutane/lb used initially,



Plank 0.4386 lbs isobutane/lb used
initially, and
Cell-Aire 0.4158 lbs propane/lb used
initially.

c) The VOC usage by each extruder shall be tracked on a monthly basis. The total pounds of VOC used for each product category shall be determined on a monthly basis. The monthly emissions which are off-gassed from the extruders manufacturing each product category shall be calculated as follows:

$(\text{VOC Used}) \times (\text{OGR}) = \text{Emissions Off-gassed}$,
where "VOC Used" is the monthly pounds of VOC used for that product category, "OGR" is the emission factor off-gas rate as shown in b) above for that product category, and "Emissions Off-gassed" is the monthly pounds of emissions off-gassed from the extruders manufacturing that product category. The monthly pounds of emissions off-gassed from each product category shall be summed to determine the total pounds of emissions off-gassed from all the extruders.

d) The monthly emissions released from the shredder/densifier operation, from a) above, and the monthly emissions off-gassed from all the extruders, from c) above, shall be summed to determine the total pounds of emissions discharged into the regenerative thermal oxidizer (RTO) from the PE.

e) The monthly pounds of VOC emissions exhausted by the RTO into the atmosphere shall be determined by applying the destruction efficiency of the RTO resulting from the most recently approved performance test, per the following calculation:

$(\text{PE Emissions}) \times ((100 - \text{RTO Effic}) / 100) = \text{VOC Emissions}$,
where "PE Emissions" is the total pounds of emissions discharged into the RTO from the PE, "RTO Effic" is the thermal destruction efficiency in percent resulting from the most recently approved stack test on the RTO, and "VOC Emissions" is the monthly pounds of VOC emissions exhausted into the atmosphere by the RTO as well as the monthly pounds of VOC emissions to be rolled on a 12 month basis.

Records shall be maintained on site to verify VOC usage rates, emission rates, and compliance.

If requested by the Department, the facility shall update the analysis of manufacturing operations to determine whether product categories have changed and to determine whether the emission factor off-gas rate and the duration

New York State Department of Environmental Conservation

Permit ID: 4-4222-00107/00020

Facility DEC ID: 4422200107



of initial curing/storage time have changed for each product category.

Parameter Monitored: VOC

Upper Permit Limit: 98000 pounds per year

Reference Test Method: As Approved By Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

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

Condition 3: Compliance Demonstration
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 3.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Sampling and Monitoring
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.11 (a)

New York State Department of Environmental Conservation

Permit ID: 4-4222-00107/00020

Facility DEC ID: 4422200107



Item 4.1:

The owner and/or operator of this facility, if required by the department to conduct stack testing to demonstrate compliance with 6 NYCRR Part 212, must comply with notification requirements and conduct capture efficiency and/or stack testing using acceptable procedures pursuant to 6 NYCRR Part 202.

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

Condition 5: Emission Unit Permissible Emissions
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 5.1:

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: P-EFOAM

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 11.3 pounds per hour

98,000 pounds per year

Condition 6: Compliance Demonstration
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.3 (a)

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-EFOAM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Sealed Air shall install a differential pressure recorder/monitor within 90 from the issuance of this permit. The unit shall be operated and maintained as per manufacturer's specifications. This device shall monitor the differential pressure between the Permanent Total Enclosure (PTE) and atmosphere.

As per EPA Method 204 the differential pressure across the



PTE must be greater than 0.013 mm Hg (0.007 in. H₂O) which corresponds to a facial velocity (FV) of 3,600 m/hr (200 fpm). The FV refers to the the velocity of air through all natural draft openings (NDO's). The direction of air flow through all NDO's shall be into the enclosure.

Sealed Air shall determine compliance with differential pressure limit by performing quarterly audits of pressure data. All deviations from standard shall be recorded, and reported to the Department within 30 days. Sealed Air shall keep records of differential pressure during operation on site and available for review for a period of five years.

Sealed Air shall submit annual certification to the Department detailing all deviation including date, time, cause, and corrective action if any for each incident.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

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

Condition 7: Compliance Demonstration
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.3 (a)

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-EFOAM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To verify that the pallets of manufactured product are properly retained in the building type permanent total enclosure (PE) for the initial curing/storage times of 0.5 hours for Special Density product, 2 hours for Plank product, and 1 hour for Cell-Aire product, randomly timed warehouse audits shall be performed.

One randomly timed warehouse audit per month for each



The facility shall conduct a Method 204 performance test and RTO performance test once within each 5 year period after 9/27/05. Submission of the test protocol and test report shall be in accordance with the requirements of Subpart 202-1 of 6 NYCRR Part 202. Testing shall demonstrate compliance with Method 204 requirements for a building type PE.

Reference Test Method: 40 CFR51 Appendix M Method 204

Monitoring Frequency: Once every five years

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 9: Compliance Demonstration
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.3 (a)

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-EFOAM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

From the analysis of production records, the facility determined that polyethylene foam product manufacturing operations result in 3 major product categories; Special Density, Plank, and Cell-Aire. The facility also identified the initial curing/storage times for each product category in order to quantify the emissions that are off-gassed into the Method 204 building type permanent total enclosure (PE) and subsequently discharged into the regenerative thermal oxidizer (source/control ID: RTO02). The initial curing/storage times identified were 0.5 hours for Special Density product, 2 hours for Plank product, and 1 hour for Cell-Aire product.

Based on the initial curing/storage times identified, product manufactured shall be retained in the PE for initial curing/storage as follows:

- a) Special Density product for 0.5 hours,
- b) Plank product for 2 hours, and
- c) Cell-Aire product for 1 hour.



permanent total enclosure (PE) according to the performance test report. During the performance testing, these door openings were kept closed except when entering and exiting the PE. The testing also verified that door #2 could be left open provided its accompanying air curtain was being operated.

Based on the testing conducted on 9/27/05, all door openings in the PE are restricted as follows:

- a) All door openings shall be kept closed during all production operations except when entering and exiting the PE.
- b) Door #2 of the PE shall be considered closed when the air curtain is activated, regardless of whether the door is actually open or closed.

Two random monthly audits of all door openings in the PE shall be performed by a qualified management member to verify that the above PE operational restriction is being met. Records of audits shall be maintained on site. Each audit shall consist of visual inspection of each door and review of door opening recordings. Each audit shall indicate, in a bound log, the date and time of the audit, whether a deviation has occurred, corrective action taken, and comments if any. Any deviation and its corrective action shall be reported to the Department in writing within 30 calendar days of the deviation. The Department reserves the right to require the facility, when deemed necessary, to perform weekly or daily audits and to keep a weekly or daily log. The department shall advise the facility in writing when weekly or daily audits are necessary and when bimonthly audits may resume.

A written certification detailing any deviations and corrective actions shall be submitted on an annual basis.

Upon Sealed Air installing differential pressure monitor for total enclosure, record keeping and monitoring requirements of this condition will no longer be required.

Sealed Air shall continue to operate with doors closed upon installation. Upon installation facility will be required to comply with record keeping and monitoring condition related to differential pressure recording unit as listed elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

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



Condition 11: Compliance Demonstration
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.11 (b) (1)

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-EFOAM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The Department has approved performance tests conducted on 9/27/05 on the regenerative thermal oxidizer (source/control ID: RTO02) for total hydrocarbons (Method 25A) and for volumetric flow rates (Methods 1-4), along with a Method 204 performance test on the polyethylene foam production area. The testing was conducted to determine the capture and destruction efficiencies of the thermal oxidizer. During the testing, the thermal oxidizer beds were maintained, such that the oxidizer exceeded the minimum degree of air cleaning of 94% required by 6 NYCRR Part 212.9(b). Six thermocouples were used to monitor temperature in the oxidizer beds.

The temperature recorded during any approved future testing resulting in compliance shall be maintained and be the future permitted temperature limit. However, until the operating temperature of the regenerative thermal oxidizer is revised by subsequent testing and by approval of the testing by the Department, the oxidizer shall be operated so that the average bed temperature shall be a limit of not less than 1775 degrees Fahrenheit, where the average bed temperature is the combined average temperature the thermocouples in the bed. This limit shall be continuously monitored and recorded. Continuous records shall be maintained on site to verify compliance.

Annual certification indicating any deviations and corrective actions shall be submitted annually

Manufacturer Name/Model Number: Allen Bradley / PLC 5
Parameter Monitored: TEMPERATURE

New York State Department of Environmental Conservation

Permit ID: 4-4222-00107/00020

Facility DEC ID: 4422200107



Lower Permit Limit: 1775 degrees Fahrenheit
Reference Test Method: 40 CFR60 Appendix A Method 25A
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2011.
Subsequent reports are due every 12 calendar month(s).

Condition 12: Compliance Demonstration
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-EFOAM

Process: PEF

Emission Source: RTO02

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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

The permittee shall conduct daily observations of visible emissions from the emission unit, process, etc. to which this condition applies whenever such emission unit, process etc. is in operation. The permittee shall investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and shall notify the Department if the method 9 test indicates that the opacity standard is not met.

New York State Department of Environmental Conservation

Permit ID: 4-4222-00107/00020

Facility DEC ID: 4422200107



Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions shall be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, written notice shall be provided to the permittee stating the inadequacies, and permittee shall have 30 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: AS REQUIRED - SEE MONITORING DESCRIPTION



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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 13: Contaminant List

Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 13.1:

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

CAS No: 0NY998-00-0

Name: VOC

Condition 14: Unavoidable noncompliance and violations

Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 14.1:

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 15: Emission Unit Definition
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 15.1:

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

Emission Unit: P-EFOAM

Emission Unit Description:

Emission Unit PEFOAM is located in Building 201 and consists of five polyethylene foam extruding lines (1, 2, 3, 6, and 7, with source/control IDs: EXT01, EXT02, EXT03, EXT06, and EXT07 respectively) and a shredder/densifier (source/control ID: SD001) in the manufacture of various types of packing materials. The emission unit has one process (process ID: PEF) which includes emissions from the five extruding lines, the shredding/densifying (reclaiming) operation, and initial curing/storage of manufactured product. Process emissions are directed to a regenerative thermal oxidizer (source/control ID: RTO02) for destruction and the resulting emissions are exhausted to the atmosphere through one emission point (emission point ID: PEF01).

The five extrusion lines manufacture polyethylene foam product for use in applications such as insulation and packaging. Virgin polyethylene chips are heated and then forced through extruders where they are blown into an expanded foam product using either isobutane (CAS No. 75-28-5) or propane (CAS No. 74-98-6). Recycle material is reclaimed with the shredder/densifier. After an initial curing/storage period, emissions of isobutane and propane not retained in manufactured product, along with emissions released by the shredder/densifier, are captured by exhaust fans in the polyethylene foam production area and exhausted to the thermal oxidizer for destruction.



The oxidizer discharges to the atmosphere through a 44-inch inside diameter stack with a height of 30 feet. The polyethylene foam production area is an area of approximately 42,000 square feet containing access doors into and out of the area. Door #2 of the area, used by fork trucks to move material and product in and out of the area, is also equipped with an air curtain. When the air curtain is activated, the door is considered to be closed. The room that houses the polyethylene foam production area meets the criteria outlined in EPA Reference Method 204 for a building type permanent total enclosure (PE).

Building(s): 201

Condition 16: Air pollution prohibited
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 16.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

Condition 17: Emission Point Definition By Emission Unit
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1:

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

Emission Unit: P-EFOAM

Emission Point: PEF01

Height (ft.): 30

Diameter (in.): 44

NYTMN (km.): 4743.7

NYTME (km.): 582.3

Building: 201

Condition 18: Process Definition By Emission Unit
Effective between the dates of 09/16/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1:

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

New York State Department of Environmental Conservation

Permit ID: 4-4222-00107/00020

Facility DEC ID: 4422200107



Emission Unit: P-EFOAM

Process: PEF

Source Classification Code: 3-01-018-63

Process Description:

Five extruding lines, one shredding/densifying
(reclaiming) operation, and initial curing/storage of
product.

Emission Source/Control: RTO02 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: EXT01 - Process

Emission Source/Control: EXT02 - Process

Emission Source/Control: EXT03 - Process

Emission Source/Control: EXT06 - Process

Emission Source/Control: EXT07 - Process

Emission Source/Control: SD001 - Process

