



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 7-0328-00080/00001
Mod 0 Effective Date: 01/28/2009 Expiration Date: No expiration date.
Mod 1 Effective Date: 11/03/2009 Expiration Date: No expiration date.
Mod 2 Effective Date: 07/28/2010 Expiration Date: No expiration date.

Permit Issued To:IMPRESS USA INC
BLDG 2 STE 200
600 N BELL AVE
CARNEGIE, PA 15106

Contact: CRAIG WALSH
IMPRESS USA INC
936 BARRACUDA ST
SAN PEDRO, CA 90731
(310) 519-2448

Facility: IMPRESS USA
379 CORPORATE PKWY
CONKLIN, NY

Description:
The facility includes two (2) can end production lines and an RTO to control VOC emissions from the lacquer score repair line. The oil score repair line uses complying coatings meeting the VOC content limit in NYCRR Part 228. In addition, Impress plans to install three EZ Peel can end lines. The EZ Peel can end lines will not emit VOC and will not exhaust to the RTO.

Impress plans to limit NOx emissions to less than 100 TPY, VOC emissions to less than 50 TPY and HAP emissions to less than 10 TPY for individual HAPs and 25 TPY for combined HAPs. These limits are below the major source thresholds, and applicability thresholds, for Title V permitting.

New York State Department of Environmental Conservation
Facility DEC ID: 7032800080



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: MICHAEL K BARYLSKI
 DIVISION OF ENVIRONMENTAL PERMITS
 1285 FISHER AVE
 CORTLAND, NY 13045-1090

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
 - Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 7
SUBOFFICE - CORTLAND



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.



Department

Applicable State Requirement: 6 NYCRR 621.13

Replaces Condition(s) 4

Item 1-1.1:

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

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

Condition 4: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Replaced by Condition(s) 1-1

Item 4.1:

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

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

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

**Condition 5: Submission of application for permit modification or renewal-REGION 7
SUBOFFICE - CORTLAND**

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 7 Sub-office
Division of Environmental Permits
1285 Fisher Avenue
Cortland, NY 13045-1090
(607) 753-3095

New York State Department of Environmental Conservation

Permit ID: 7-0328-00080/00001

Facility DEC ID: 7032800080



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To:IMPRESS USA INC
BLDG 2 STE 200
600 N BELL AVE
CARNEGIE, PA 15106

Facility: IMPRESS USA
379 CORPORATE PKWY
CONKLIN, NY

Authorized Activity By Standard Industrial Classification Code:
3411 - METAL CANS

Mod 0 Permit Effective Date: 01/28/2009
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 11/03/2009
date.

Permit Expiration Date: No expiration

Mod 2 Permit Effective Date: 07/28/2010
date.

Permit Expiration Date: No expiration



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 2 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *1-1 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *1-2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 2-1 6 NYCRR Subpart 202-1: Compliance Demonstration
- 2-2 6 NYCRR 212.4 (a): Compliance Demonstration
- 8 6 NYCRR 212.4 (b): Compliance Demonstration
- 9 6 NYCRR 212.4 (c): Compliance Demonstration
- 10 6 NYCRR 212.6 (a): Compliance Demonstration
- 2-3 6 NYCRR 228.3 (a): Compliance Demonstration
- 2-4 6 NYCRR 228.3 (b): Compliance Demonstration
- 2-5 6 NYCRR 228.3 (c): Compliance Demonstration
- 2-6 6 NYCRR 228.4: Compliance Demonstration
- 2-7 6 NYCRR 228.5: Compliance Demonstration
- 2-8 6 NYCRR 228.5 (g): Compliance Demonstration
- 2-9 6 NYCRR 228.10: Compliance Demonstration

Emission Unit Level

EU=P-ROC01

- 11 6 NYCRR 228.1 (d): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 19 ECL 19-0301: Contaminant List
- 1-3 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 21 6 NYCRR Subpart 201-5: Emission Unit Definition
- 22 6 NYCRR 201-5.3 (b): Compliance Demonstration
- 1-4 6 NYCRR 201-5.4 (b): Compliance Demonstration
- 1-5 6 NYCRR 211.2: Air pollution prohibited

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: 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: Recycling and Emissions Reduction
Effective between the dates of 01/28/2009 and Permit Expiration Date

Applicable Federal Requirement:40CFR 82, Subpart F

Item 1.1:

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

Condition 2: Facility Permissible Emissions
Effective between the dates of 01/28/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2.1:

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: 000100-41-4 (From Mod 2)	PTE: 19,800 pounds
	Name: ETHYLBENZENE	
per year	CAS No: 000108-10-1 (From Mod 2)	PTE: 19,800 pounds
	Name: 2-PENTANONE, 4-METHYL	
per year	CAS No: 000108-88-3 (From Mod 2)	PTE: 19,800 pounds
	Name: TOLUENE	
per year	CAS No: 001330-20-7 (From Mod 2)	PTE: 19,800 pounds
	Name: XYLENE, M, O & P MIXT.	
per year	CAS No: 0NY100-00-0 (From Mod 2)	PTE: 49,900 pounds
	Name: HAP	
per year	CAS No: 0NY998-00-0 (From Mod 2)	PTE: 99,800 pounds
	Name: VOC	

Condition 1-1: Capping Monitoring Condition



Effective between the dates of 11/03/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Replaces Condition(s) 5

Item 1-1.1:

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)
40 CFR Part 63, Subpart KKKK

Item 1-1.2:

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

Item 1-1.3:

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

Item 1-1.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-1.5:

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

Item 1-1.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-1.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The facility has chosen to limit (cap) the potential to emit emissions of total Hazardous Air Pollutants (HAPs) to



below the major source threshold of 25 tons per year. Total facility emissions of Hazardous Air Pollutants (HAPs), as defined in 6 NYCRR Part 200, shall not equal or exceed 25 tons in any consecutive 12 month period (annual maximum rolled monthly).

Compliance with this emission limit (cap) is required for the facility to remain below the applicability threshold of 6 NYCRR 201-6.1(a), Title V permitting, and 40 CFR 63, subpart KKKK.

Verification of monthly and annual HAP emissions shall be determined using compliance demonstration methods acceptable to the Department including, but not limited to, records of monthly coatings, lubricants and clean up materials used, and the most recent stack test results.

A summary of emissions shall be included in the facility's annual emissions cap certification submitted pursuant to 6 NYCRR Part 201-7.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2010.
Subsequent reports are due every 12 calendar month(s).

Condition 1-2: Capping Monitoring Condition
Effective between the dates of 11/03/2009 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Replaces Condition(s) 4

Item 1-2.1:
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)
40 CFR Part 63, Subpart KKKK

Item 1-2.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-2.3:
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 1-2.4:

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 1-2.5:

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 1-2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000100-41-4	ETHYLBENZENE
CAS No: 000108-10-1	2-PENTANONE, 4-METHYL
CAS No: 000108-88-3	TOLUENE
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.

Item 1-2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility has chosen to limit (cap) the potential to emit emissions of individual Hazardous Air Pollutants (HAPs) to below the major source threshold of 10 tons per year. Facility emissions of any individual Hazardous Air Pollutant, as defined in 6 NYCRR Part 200, shall not equal or exceed 10 tons in any consecutive 12 month period (annual maximum rolled monthly).

Any HAP, not listed above, added and emitted from the facility as a result of operational flexibility pursuant to 6 NYCRR Part 201-5.4(b) shall also comply with the individual HAP limitation of less than 10 tons in any consecutive 12 month period.

Compliance with this emission limit (cap) is required for the facility to remain below applicability threshold of 6 NYCRR 201-6.1(a), Title V permitting, and 40 CFR 63, subpart KKKK.

Verification of monthly and annual HAP emissions shall be determined using compliance demonstration methods acceptable to the Department including, but not limited



to, records of monthly coatings, lubricants and clean up materials used, and the most recent stack test results.

A summary of emissions shall be included in the facility's annual emissions cap certification submitted pursuant to 6 NYCRR Part 201-7.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2010.
Subsequent reports are due every 12 calendar month(s).

Condition 3: Capping Monitoring Condition
Effective between the dates of 01/28/2009 and Permit Expiration Date

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 201-6.1 (a)
6 NYCRR 212.10
6 NYCRR Subpart 231-2

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:

The facility has chosen to limit (cap) the potential to emit emissions of Volatile Organic Compounds (VOCs) to below the major source threshold of 50 tons per year. Total facility emissions of Volatile Organic Compounds (VOCs), as defined in 6 NYCRR Part 200, shall not equal or exceed 50 tons in any consecutive 12 month period (annual maximum rolled monthly).

Compliance with this emission limit (cap) is required for the facility to remain below the applicability thresholds of 6 NYCRR 201-6.1(a), Title V permitting, 6 NYCRR 212.10, Process VOC RACT, and 6 NYCRR 231-2, New Source Review in Nonattainment Areas and Ozone Transport Regions.

Verification of monthly and annual VOC emissions shall be determined using compliance demonstration methods acceptable to the Department including, but not limited to, records of monthly coatings, lubricants and clean up materials used, and the most recent stack test results.

An initial performance test to establish the capture and destruction efficiency of the regenerative thermal oxidizer (RTO), and the associated exhaust gas temperature, is required to be conducted pursuant to 6 NYCRR 202-1 contained elsewhere in this permit.

The RTO outlet gas temperature established during the most recent performance test shall be the minimum outlet gas temperature required, during process operations, in order for the owner or operator to utilize the capture and control efficiency established during the most recent performance test in the monthly and annual emission calculations. Additional performance tests may be conducted at alternate outlet gas temperatures to establish the corresponding capture and control efficiencies at these alternate outlet gas temperatures.



2a. The owner or operator shall submit a stack test protocol for NYSDEC approval at least 60 days prior to the commencement of stack testing.

2b. The owner or operator shall provide the NYSDEC with written notification of the actual date of initial startup of the facility within 30 days after such date.

2c. The owner or operator shall submit a final test report with the results of the stack testing within 60 days from completion of stack testing.

3. The owner or operator may request extensions of the time frames for submitting test protocols and conducting stack testing by submitting a request in writing to the NYSDEC Region 7 Regional Air Pollution Control Engineer.

4. The owner or operator shall conduct additional compliance stack tests upon request by the NYSDEC.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 2-2: Compliance Demonstration
Effective between the dates of 07/28/2010 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (a)

Replaces Condition(s) 7

Item 2-2.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 2-2.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

1. No person shall cause or allow emissions that exceed the permissible emission rate as determined from Table 2, Table 3 or Table 4 of this Part for the environmental rating issued by the commissioner.

2. Emission unit P-PROC01, processes 001, 002 and 004, emits various contaminants classified as low and/or moderately toxic contaminants at emission rate potentials less than 10 lbs/hrs. The most recent data indicates that at the proposed (current) emission rates and stack heights, predicted offsite ambient concentrations are below the existing annual guideline concentration (AGC) and short-term guideline concentration (SGC) established



by the Department's DAR-1 guidance document for contaminants emitted from the facility. Therefore, these contaminants are assigned an initial environmental rating of "B". Table 2 of 6 NYCRR Part 212.9(b) specifies that for "B" rated contaminants with emission rate potentials (ERPs) less than 10 lbs/hr, the degree of air cleaning required shall be specified by the commissioner. Based on facility wide impacts at the current emission rates and stack heights, no air cleaning (control) for these contaminants are required at this time.

3. Should new information become available that results in a decision by DEC that lower ambient concentrations and emissions of these contaminants are necessary, the Department may require control of these contaminants.

4. Monthly and annual emission summaries shall be included in the facility's annual capping certification report.

Note: Processes 003 and 005, Score Repair, are surface coating processes subject to 6 NYCRR Part 228. VOC and HAP emissions from process 003 are controlled by a regenerative thermal oxidizer. Process 005 utilizes a compliant coating and emission are not controlled by the RTO. The predicted facility impacts for actual emissions, including processes 003 and 005, for these contaminants also are below their respective AGC and SGC. As such, they are not "A" rated contaminants, and therefore, are not subject to the Part 212 requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Compliance Demonstration
Effective between the dates of 01/28/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (b)

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 7-0328-00080/00001

Facility DEC ID: 7032800080



For gases and liquid particulates with an environmental rating of A, B, or C and for solid particulates with an environmental rating of A, where the emission rate potential is not shown in Table 2 the permissible emission rate shall be specified by the commissioner.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Compliance Demonstration
Effective between the dates of 01/28/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 9.1:

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

Emission Unit: P-ROC01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In instances where the determination of permissible emission rate using process weight is not applicable (see Table 5) and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.05 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry basis.

Compliance testing for particulates shall be conducted upon request by the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 10: Compliance Demonstration
Effective between the dates of 01/28/2009 and Permit Expiration Date



Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 10.1:

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

Emission Unit: P-ROC01
Process: 001

Emission Unit: P-ROC01
Process: 002

Emission Unit: P-ROC01
Process: 004

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

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 shall be determined by opacity testing upon request of the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: USEPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 2-3: Compliance Demonstration
Effective between the dates of 07/28/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.3 (a)

Item 2-3.1:

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

Emission Unit: P-ROC01
Process: 003

Emission Unit: P-ROC01
Process: 005

New York State Department of Environmental Conservation

Permit ID: 7-0328-00080/00001

Facility DEC ID: 7032800080



Item 2-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Use of coatings that exceed the maximum permitted pounds of VOC per gallon, minus water and excluded VOC at application specified in table 1 of section 228.7 or table 2 of section 228.8 of this Part is prohibited, unless a coating system meeting the requirements of subdivision (d) of this section is utilized, control equipment meeting the requirements of subdivisions (b) and (c) of this section is installed and operated, or a process specific RACT variance is granted under subdivision (e) of this section.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-4: Compliance Demonstration

Effective between the dates of 07/28/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.3 (b)

Item 2-4.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: P-ROC01

Process: 003

Emission Unit: P-ROC01

Process: 005

Item 2-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any VOC incinerator used as control equipment must be designed and operated to provide, at a minimum, an 80 percent overall removal efficiency. The department may allow an owner or operator of a facility which uses a natural gas fired VOC incinerator as a control device for coating lines subject to this Part, to shut down the VOC incinerator from November 1st through March 31st for the purposes of natural gas conservation, provided the department has determined that this action will not jeopardize air quality.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-5: Compliance Demonstration
Effective between the dates of 07/28/2010 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 228.3 (c)

Item 2-5.1:

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

Emission Unit: P-ROC01
Process: 003

Emission Unit: P-ROC01
Process: 005

Item 2-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

1. The overall removal efficiency of an air cleaning device used as a control strategy must be determined, for every surface coating formulation, on a solids as applied basis using Equation 2 unless an 85 percent or greater overall removal efficiency is achieved by the air cleaning device. The air cleaning device must be designed and operated to provide, at a minimum, an overall removal efficiency of either 85 percent or as determined by Equation 2 of this section.
2. The owner or operator shall conduct a performance test to establish the overall removal efficiency (capture efficiency and destruction efficiency) of the regenerative thermal incinerator, and the associated outlet gas temperature necessary to achieve the demonstrated destruction efficiency of the incinerator.
3. The exhaust gas temperature shall be greater than the minimum outlet gas temperature (3 hour block average) demonstrated to achieve 85 percent capture and control during the most recent performance stack test.
4. The performance test shall be conducted in accordance with 6 NYCRR 202-1 contained elsewhere in this permit.

Parameter Monitored: VOC

Lower Permit Limit: 85 percent reduction by weight

Reference Test Method: Method 18, 25, 25A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 2-6: Compliance Demonstration
Effective between the dates of 07/28/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.4

Item 2-6.1:

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

Emission Unit: P-ROC01
Process: 003

Emission Unit: P-ROC01
Process: 005

Item 2-6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions 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 owner or operator will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with section 228.4 are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are



made, the owner or operator will immediately notify the NYSDEC, and conduct a Method 9 assessment as soon as possible, or as directed by the Department, to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department. A summary of these records shall be included in the annual capping certification report submitted in accordance with 6 NYCRR 201-7.

Parameter Monitored: VISIBLE EMISSIONS

Upper Permit Limit: 20 percent

Monitoring Frequency: WEEKLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-7: Compliance Demonstration
Effective between the dates of 07/28/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.5

Item 2-7.1:

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

Emission Unit: P-ROC01

Process: 003

Emission Unit: P-ROC01

Process: 005

Item 2-7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) The owner or operator of any emission source subject to this Part must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the department. Any facility required to perform the overall removal efficiency calculation set forth in Equation 2 of this Part, must maintain records to verify the parameters used in the calculation. A facility owner or operator must



maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department.

(b) The owner and operator of any emission source subject to this Part must, upon request by the department, use Method 311 or Method 24 as presented in Appendix A of both 40 CFR parts 63 and 60, respectively (see table 1, section 200.9 of this Title), to measure the volatile content, water content, density, volume of solids, and weight of solids in order to determine the actual VOC content of an as applied coating during a compliance demonstration.

(c) When the sampling and analysis methods referenced in subdivision (b) or (f) or paragraph (e)(2) of this section are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

(d) Representatives of the department must be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with this Part.

(e) When a coating line utilizes control equipment to comply with the provisions of this Part, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

(f) The owner and/or operator of a surface coating process must follow the applicable notification requirements, protocol requirements and test procedures of Part 202 of this Title for testing and monitoring. Depending upon conditions at a test site, one of the following test methods from Appendix A of 40 CFR part 60 (see Table 1, section 200.9 of this Title) must be used when measuring VOC concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

(1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;

(2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or

(3) Method 25A, Determination of Total Gaseous Organic



Concentration Using a Flame Ionization Analyzer.

(g) If an air cleaning device is used, continuous monitors for the following parameters must be installed, periodically calibrated, and operated when the associated control equipment is operating:

- (1) exhaust gas temperature of all incinerators;
- (2) temperature rise across catalytic incinerator bed;
- (3) breakthrough of VOCs on a carbon absorption unit; and
- (4) any other continuous monitoring or recording device required by the department.

(h) Every owner or operator of a facility which is not subject to the VOC control requirements set forth in section 228.3 of this Part because its annual potential to emit VOCs is below the thresholds set forth in section 228.1 of this Part must maintain records in a format acceptable to the department that verify the facility's annual potential to emit VOCs. Upon request, these records must be submitted to the department.

(i) For each ED calculation performed under section 228.3(d) of this Part, the owner or operator of the coating system must record the following and make the records available to the department upon request: the name or identification of each coating; the coating parameters used in Equation 7, the individual ED values for each coating, and the ED value calculated for the coating system.

(j) Any information or record showing noncompliance with the requirements of this Part must be reported to the department within 30 days following notice or generation of the information or record.

(k) All records required by this section must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-8: Compliance Demonstration
Effective between the dates of 07/28/2010 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 228.5 (g)

New York State Department of Environmental Conservation

Permit ID: 7-0328-00080/00001

Facility DEC ID: 7032800080



Item 2-8.1:

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

Emission Unit: P-ROC01
Process: 003

Emission Unit: P-ROC01
Process: 005

Item 2-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If an air cleaning device is used, continuous monitors for the following parameters must be installed, periodically calibrated, and operated when the associated control equipment is operating:

1. exhaust gas temperature of all incinerators;
 2. temperature rise across catalytic incinerator bed;
 3. breakthrough of VOCs on a carbon absorption unit;
- and
- 4 any other continuous monitoring or recording device required by the department.

A summary of monitoring records shall be included in the annual capping certification report submitted in accordance with 6 NYCRR 201-7.

Monitoring Frequency: CONTINUOUS

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 2-9: Compliance Demonstration

Effective between the dates of 07/28/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.10

Item 2-9.1:

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

Emission Unit: P-ROC01
Process: 003

Emission Unit: P-ROC01
Process: 005



Item 2-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and VOC solvents.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**** Emission Unit Level ****

Condition 11: Compliance Demonstration
Effective between the dates of 01/28/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 228.1 (d)

New York State Department of Environmental Conservation

Permit ID: 7-0328-00080/00001

Facility DEC ID: 7032800080



Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-ROC01

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any coating line that is or becomes subject to the provisions of the Part, will remain subject to these provisions even if the annual potential to emit VOCs for the facility later falls below the thresholds set forth in subdivision (b) of this section.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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 19: Contaminant List

Effective between the dates of 01/28/2009 and Permit Expiration Date

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: 000100-41-4

Name: ETHYLBENZENE

CAS No: 000108-10-1

Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 001330-20-7

Name: XYLENE, M, O & P MIXT.

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 1-3: Unavoidable noncompliance and violations

Effective between the dates of 11/03/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Replaces Condition(s) 20

Item 1-3.1:

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 21: Emission Unit Definition
Effective between the dates of 01/28/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 21.1(From Mod 2):

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

Emission Unit: P-ROC01

Emission Unit Description:

The emission unit consists of 2 EZ Open can end lines and three (3) EZ Peel can end lines. These can end lines will produce metal can ends for a variety of packaging products, including food items.

One of the EZ Open can end lines, the lacquer score repair line will include:

A crown shell press;

A liner seal compound applicator and dryer;



A conversion press;
A score repair operation;
Score repair coating dryer; and,
Packaging.

The second EZ Open line will include the same process operations except there will not be a score repair dryer on the oil score repair line.

The crown seal press converts coated metal stock into "shells". After the shells are formed a water-based seal compound is applied to the "curl" of the shell. This compound forms a "gasket" when the end is attached to the can. The water-based material is dried in an induction dryer. The only emissions from this operation are water and ammonia.

In the conversion press a score is created in the can end and a pull tab is affixed. A lubricant is applied during the manufacture of the pull tab.

In order to protect the can end from corrosion in the area of the score, a repair coating is applied to the score area. The score repair coating is either an oil or a lacquer material. Plans are to dedicate one line for application of oil spray score repair coatings. VOC emissions from the oil score repair and the lacquer score repair application and drying will be exhausted to the RTO. From the score lacquer application, the can ends pass through drying ovens, are cooled and packaged. From the oil score repair application, can ends pass directly into a packaging area. Airless spray application equipment will be used to apply the score repair coatings.

The three (3) EZ Peel can end lines will include the following operations:

A double die shell press;
A liner seal compound applicator and
dryer;
A conversion press;
Foil seal application;
Testing; and
Packaging

The only emission point in the EZ Peel line is the application of the liner seal compound. This process results in ammonia and water emissions that are released into the plant.

Building(s): Building 1



Condition 22: Compliance Demonstration
Effective between the dates of 01/28/2009 and Permit Expiration Date

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

Item 22.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall develop a written startup, shutdown and malfunction (SSM) plan that describes procedures for operating and maintaining the sources during periods of startup, shutdown and malfunction; and corrective actions that may be taken for malfunctioning processes, air pollution control and monitoring equipment.

The SSM plan shall be submitted to the NYSDEC no later than the date the initial performance stack test report is submitted.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-4: Compliance Demonstration
Effective between the dates of 11/03/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-5.4 (b)

Replaces Condition(s) 23

Item 1-4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility:

Additional chemicals, coatings and /or formulations, or increases in existing chemicals and/or formulations, that meet the following criteria may also be used at the facility.

1. The owner or operator shall maintain a log of all chemicals, coatings and formulations used at the



facility.

2. Each chemical and/or formulation, shall be evaluated prior to use and comply with this condition for operational flexibility.
3. Prior to any proposed changes or modifications the owner or operator shall identify all potential pollutants, including A-rated contaminants, hazardous air pollutants (HAPs), volatile organic compounds (VOCs), and non-VOC pollutants, and the corresponding emission rates that will occur as a result of the proposed changes or modifications. A-rated contaminants are those contaminants listed with a "high" toxicity in the Department's most recent DAR -1 (formerly Air Guide 1) guidance document, and any other contaminants that may be A-rated by the Department;
4. Non-VOC pollutants, which are not A-rated, shall be assigned an environmental rating of "B";
5. Application of the coatings or formulations will not result in the emission of any A-rated contaminant with an emission rate potential equal to or greater than 1.0 pound/hr;
6. Application of the formulations will not result in the emission of any non-A rated, non-VOC contaminant with an emission rate potential equal to or greater than 10.0 pounds/hr;
7. The emission of any contaminant shall not cause an off-site ambient concentration in excess of the Annual Guideline Concentration (AGC) and/or Short Term Guideline Concentration (SGC), established in the Department's most recent DAR-1 guidance document, for each contaminant emitted;
8. A facility wide DAR-1 (Air Guide 1) analysis must be completed that demonstrates there are no predicted off-site ambient concentration in excess of the AGC or SGC for each contaminant.
9. Certain changes which meet the criteria under (i) - (iii) below may be conducted without prior approval of the Department and shall not require modification of the permit. The facility owner and/or operator must however maintain records of the date and description of such changes and make such records available for review by Department representatives upon request.

(i) Changes that do not



cause emissions to exceed any emission limitation contained in regulations or applicable requirements under 6 NYCRR.

(ii) Changes which do not cause the subject emission unit, emission source, process, or emission point to become subject to any additional regulations or requirements under 6 NYCRR.

(iii) Changes that do not seek to establish or modify a federally-enforceable emission cap or limit.

10. In addition to the record keeping required above, the permittee must notify the Department in writing at least 30 calendar days in advance of making changes involving:

(i) the installation or relocation of any emission unit, emission source, process, or emission point within a facility;

(ii) the emission of any air pollutant not previously authorized or emitted in accordance with a permit issued by the Department;

(iii) the installation or alteration of any air cleaning installation, device or control equipment.

11. The Department may require a permit modification, in order to impose applicable requirements or special permit conditions if it determines that changes proposed pursuant to notification under (10) above do not meet the criteria under (9) above or the change may have a significant air quality impact. In such cases the Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the change for air quality impacts and/or applicable requirements. The Department shall respond to the permittee in writing with such a determination within 15 days of receipt of the 30 day advance notification from the permittee. The Department's determination shall include a listing of information necessary to further review the proposed change.

12. A summary of all activities conducted under this operational flexibility shall be reported in the facility's annual emissions cap certification submitted pursuant to 6 NYCRR Part 201-7.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

New York State Department of Environmental Conservation

Permit ID: 7-0328-00080/00001

Facility DEC ID: 7032800080



DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2010.

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

Condition 1-5: Air pollution prohibited
Effective between the dates of 11/03/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Replaces Condition(s) 24

Item 1-5.1:

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

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

Condition 25: Emission Point Definition By Emission Unit
Effective between the dates of 01/28/2009 and Permit Expiration Date

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: P-ROC01

Emission Point: EP001

Height (ft.): 50

Diameter (in.): 18

NYTMN (km.): 4656.613 NYTME (km.): 432.218 Building: Building 1

Condition 26: Process Definition By Emission Unit
Effective between the dates of 01/28/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 26.1(From Mod 2):

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

Emission Unit: P-ROC01

Process: 003

Source Classification Code: 4-02-017-99

Process Description:

Can end lines 1-307 and 2-30X apply a score repair compound to the score area to prevent corrosion of the can end. The score repair compound is applied in a fine



stream by hydraulic pressure. There is no air atomization.

Line 2-30X utilizes a lacquer for score repair. After the lacquer is applied to the score on these lines, the cans proceed to natural gas fired ovens where the lacquer is dried. Exhaust from the score repair application area and from the ovens is routed to an RTO for destruction. The emission sources are subject to 6 NYCRR Part 228.

Emission Source/Control: RTO01 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 230X3 - Process

Item 26.2(From Mod 2):

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

Emission Unit: P-ROC01
Process: 005 Source Classification Code: 4-02-017-99
Process Description:

Can-end lines 1-307 and 2-30X apply a score repair compound to the score area to prevent corrosion of the can end. The score repair compound is applied in a fine stream by hydraulic pressure. There is no air atomization.

Line 1-307 applies an oil score repair compound and the cans proceed directly from the score repair to packaging. The emission points are subject to 6 NYCRR Part 228. This operation applies a complying coating meeting the VOC content in Part 228.

Emission Source/Control: 13073 - Process

Item 26.3(From Mod 1):

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

Emission Unit: P-ROC01
Process: 001 Source Classification Code: 4-02-888-01
Process Description:

Can end lines 1-307, 2-30X, 2-400 utilize shell presses to form the can end shell. After the shell is formed a liner compound is applied to the curl of the shell. The liner compound is a water-based material with no VOC. The liner compound contains a maximum of 1 percent by weight of ammonia. After the liner compound is applied, the shell passes through an induction oven where the compound is dried. There are no cure volatiles released, but the drying releases ammonia. The ammonia is released as fugitive emissions into the plant. The emission sources are subject to 6 NYCRR Part 212.



Emission Source/Control: 13071 - Process

Emission Source/Control: 230X1 - Process

Emission Source/Control: 34001 - Process

Item 26.4(From Mod 1):

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

Emission Unit: P-ROC01

Process: 002

Source Classification Code: 4-01-888-01

Process Description:

Can end lines 1-307 and 2-30X apply a tab lubricant to facilitate the formation of the tab. VOC emissions from the lubricants are released as fugitive emissions into the plant. The lubricants contain no HAPS. The emission sources are subject to 6 NYCRR Part 212.

Emission Source/Control: 13072 - Process

Emission Source/Control: 230X2 - Process

Item 26.5(From Mod 1):

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

Emission Unit: P-ROC01

Process: 004

Source Classification Code: 4-02-017-05

Process Description:

Clean-up solvent is used to remove excess score repair compound from the score repair application areas. Emissions are exhausted as fugitive contaminants to the plant. The emission sources are subject to 6 NYCRR Part 212.

Emission Source/Control: 13074 - Process

Emission Source/Control: 230X4 - Process

Emission Source/Control: 34001 - Process

