

New York State Department of Environmental Conservation
Facility DEC ID: 7313600054



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 7-3136-00054/00006
Effective Date: 08/04/2000 Expiration Date: No expiration date

Permit Issued To: SPECIALIZED PACKAGING RADISSON LLC
8800 SIXTY ROAD
BALDWINVILLE, NY 13027

Contact: ROBERT GARIEPY
8800 SIXTY ROAD
P O BOX 460
BALDWINVILLE, NY 13027

Facility: SPECIALIZED PACKAGING RADISSON LLC
8800 SIXTY RD
BALDWINVILLE, NY 13027

Description:

Specialized Packaging manufactures boxboard cartons primarily for consumer products. Inks and coatings (specific to each customer) are blended and delivered to the rotogravure presses for application.

The two rotogravure presses are identical, each with 8 color stations. The ink dryer exhaust is captured and vented to two thermal oxidizers (in parallel). Printed cartons are die-cut; trim is pneumatically conveyed to a baler. A baghouse captures particulate from baling and conveying.

Solvents are used to clean presses and ancillary equipment. Various parts are cleaned in an enclosed parts washer, which exhausts to the oxidizer. Cleaning solvents are distilled, recovered and reused.

Facility is capping-out of applicable requirement: Part 201-6 for VOC. Actual annual emission from this facility will be less than 49.9 tons; for tracking purposes, compliance will be verified by taking the maximum (monthly) potential to emit VOC for all maintenance and incidental use products, adding the (monthly) VOC emissions from adhesives plus the monthly ink, solvent and coating VOC emissions multiplied by the thermal oxidizer destruction efficiency (which must be a minimum of 98.2 %); VOC emission based on usage/content. Therefore, the oxidizer Emission Unit (1-PRINT) will be limited based on 98.2 % destruction of 2365 tons of VOC per year, or 42.57 tons per year.

Facility is also capping out of applicable requirement: 201-6 for aggregate HAP (at 24.9 tons per year) and single HAP (at 9.9, tons per year for each).

The thermal oxidizer will be stack tested to determine the exact correlation between thermal destruction efficiency and oxidizer chamber temperature and thus will establish a minimum operating temperature to assure a high enough destruction efficiency to maintain enforceable emission caps.

FINAL

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By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: ROBERT A TORBA
 615 ERIE BLVD WEST
 SYRACUSE, NY 13204-2400

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 7
HEADQUARTERS

DEC SPECIAL CONDITIONS

Facility inspection by the department.



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 and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

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.

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

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Expired by Mod No: 2

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 7
HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 7 Headquarters
Division of Environmental Permits
615 Erie Blvd West
Syracuse, NY 13204-2400
(315) 426-7400

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DEC SPECIAL CONDITIONS

Condition 6: Facility inspection by the department.
Applicable State Requirement: ECL 3-0301.2(g)

Item 6.1:



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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: SPECIALIZED PACKAGING RADISSON LLC
8800 SIXTY ROAD
BALDWINSVILLE, NY 13027

Facility: SPECIALIZED PACKAGING RADISSON LLC
8800 SIXTY RD
BALDWINSVILLE, NY 13027

Authorized Activity By Standard Industrial Classification Code:

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LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 20 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 3 6NYCRR 200.7: Maintenance of equipment
- 7 6NYCRR 201-1.7: Recycling and Salvage
- 8 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected
Contaminants to the Air
- 10 6NYCRR 201-3.2(a): Proof of Eligibility
- 11 6NYCRR 201-3.3(a): Proof of Eligibility
- 17 6NYCRR 202-1.1: Required emissions tests
- 19 6NYCRR 211.3: Visible emissions limited.
- 1 6NYCRR 200.5: Sealing
- 2 6NYCRR 200.6: Acceptable ambient air quality
- 4 6NYCRR 201-1.2: Unpermitted Emission Sources
- 5 6NYCRR 201-1.4: Unavoidable Noncompliance and Violations
- 6 6NYCRR 201-1.5: Emergency Defense
- 9 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 12 6NYCRR 201-6.1(a): Facility Permissible Emissions
- *13 6NYCRR 201-6.1(a): Compliance Demonstration
- *14 6NYCRR 201-6.1(a): Compliance Demonstration
- *15 6NYCRR 201-6.1(a): Compliance Demonstration
- 16 6NYCRR 201-7.2: Synthetic minor facility capping provisions.
- 18 6NYCRR 202-1.5: Prohibitions
- 21 6NYCRR 234.4(c)(4): Facility Permissible Emissions
- 22 40CFR 82.156, Subpart F: Class I/II recycling and emission reduction
- required practices

Emission Unit Level

EU=1-PRINT

- 23 6NYCRR 234.3(a)(3)(ii): Compliance Demonstration
- 24 6NYCRR 234.3(e): Compliance Demonstration
- *25 6NYCRR 234.4(c)(4): Compliance Demonstration

EU=1-PRINT,Proc=PRT

- 26 6NYCRR 234.6: Handling, storage, and disposal of volatile organic
compounds

EU=1-PRINT,EP=00001

- 27 6NYCRR 212.3(b): Compliance Demonstration

EU=1-PRINT,EP=00001,Proc=PRT,ES=0000A

- 28 6NYCRR 234.3(e): Compliance Demonstration

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STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 29 6NYCRR 201-5: General Provisions
- 30 6NYCRR 201-5: Emission Unit Definition
- 31 6NYCRR 201-5.3(b): Contaminant List
- 32 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 33 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 34 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping. 2754 - COMMERCIAL
PRINTING, GRAVURE

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FEDERALLY ENFORCEABLE CONDITIONS

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

Condition 20: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 20.1:

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

Condition 3: Maintenance of equipment
Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 3.1:

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

Condition 7: Recycling and Salvage
Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 7.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Condition 8: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 8.1:

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

Condition 10: Proof of Eligibility
Effective between the dates of 08/04/2000 and Permit Expiration Date

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

Item 10.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 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.

Condition 11: Proof of Eligibility

Effective between the dates of 08/04/2000 and Permit Expiration Date

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

Item 11.1:

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.

Condition 17: Required emissions tests

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 17.1:

An acceptable report of measured emissions shall be submitted, as may be required by the commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Condition 19: Visible emissions limited.

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 19.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-



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minute period per hour of not more than 57 percent opacity.

Condition 1: Sealing

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

(a) 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 labelling 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.

(b) 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.

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

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.

Condition 4: Unpermitted Emission Sources

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 4.1:

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

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(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.

Condition 5: Unavoidable Noncompliance and Violations
Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.4

Item 5.1:

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 or certificate issued for the corresponding air contamination source. 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.

(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.



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Condition 6: Emergency Defense

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 6.1:

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.

Condition 9: Public Access to Recordkeeping

Effective between the dates of 08/04/2000 and Permit Expiration Date

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

Item 9.1:

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.

Condition 12: Facility Permissible Emissions



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Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 12.1:

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: 0NY100-00-0

PTE: 49,800 pounds per year

Name: HAP

CAS No: 0NY998-00-0

PTE: 99,800 pounds per year

Name: VOC

Condition 13: Compliance Demonstration

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Facility shall keep records to verify that total facility Volatile Organic Compound emissions shall not exceed 49.9 tons over any 12-month consecutive period.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RAW MATERIAL

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 49.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 09/02/2001 for the period 08/04/2000 through 08/03/2001



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Condition 14: Compliance Demonstration

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

Facility shall keep records to verify that total facility
Hazardous Air Pollutant emissions shall not exceed 9.9
tons (for any single HAP) over any twelve consecutive
month period.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RAW MATERIAL

Parameter Monitored: HAP

Upper Permit Limit: 9.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 09/02/2001 for the period 08/04/2000 through 08/03/2001

Condition 15: Compliance Demonstration

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes



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Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Facility shall keep records to verify that total facility aggregate Hazardous Air Pollutant emissions shall not exceed 24.9 tons (for any combination of HAPs) over any twelve consecutive month period.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RAW MATERIAL

Parameter Monitored: HAP

Upper Permit Limit: 24.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 09/02/2001 for the period 08/04/2000 through 08/03/2001

Condition 16: Synthetic minor facility capping provisions.
Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 16.1:

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

Item 16.2:

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

Item 16.3:

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

Item 16.4:

The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of Part 201 and of the Act.

Condition 18: Prohibitions
Effective between the dates of 08/04/2000 and Permit Expiration Date

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Applicable Federal Requirement: 6NYCRR 202-1.5

Item 18.1:

No person shall conceal an emission by the use of air or other gaseous diluents to achieve compliance with an emission standard which is based on the concentration of a contaminant in the gases emitted through a stack.

Condition 21: Facility Permissible Emissions

Effective between the dates of 08/04/2000 and Permit Expiration Date

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

Item 21.1:

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: 99,800 pounds per year

Name: VOC

Condition 22: Class I/II recycling and emission reduction - required practices

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 82.156, Subpart F

Item 22.1:

Facilities disposing of appliances, except for small appliances and mechanical vapor compression open vapor compression appliances, must comply with the provisions of this section.

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

Condition 23: Compliance Demonstration

Effective between the dates of 08/04/2000 and Permit Expiration Date

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

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

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Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Where a packaging rotogravure printing process is employed, the capture system and the air cleaning device must provide for an overall reduction in volatile organic compound emissions of at least 65.0 percent.

Parameter Monitored: VOC

Lower Permit Limit: 65.0 percent reduction by weight

Reference Test Method: Method 25 (40CFR60)

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 24: Compliance Demonstration

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Item 24.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Opacity requirement

Parameter Monitored: OPACITY

Upper Permit Limit: 10.0 percent

Reference Test Method: EPA RM 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 25: Compliance Demonstration

Effective between the dates of 08/04/2000 and Permit Expiration Date

New York State Department of Environmental Conservation

Permit ID: 7-3136-00054/00006

Facility DEC ID: 7313600054



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

Item 25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

OXIDIZERS COMBUSTION CHAMBER
TEMPERATURES SHALL BE MONITORED AND
RECORDED ON CHART RECORDER CONTINUOUSLY
AND MUST CORRESPOND TO CONDITIONS
DETERMINED BY TESTING. AFTER STACK TEST,
IF MONITORING CONDITION(S) NEED(S) TO BE
CHANGED, AN ADMINISTRATIVE MODIFICATION
WILL BE INITIATED BY THE FACILITY TO
CHANGE NECESSARY DATA (LOWER LIMIT
TEMPERATURE/DESTRUCTION EFFICIENCY) AND
DELETE STACK TEST REQUIREMENT.

Manufacturer Name/Model Number: THERMOCOUPLER/RECORDER

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1370.0 degrees Fahrenheit

Reference Test Method: 40 CFR60 APPEN A-M25

Monitoring Frequency: CONTINUOUS

Averaging Method: 12-HR ROLLING AVG, CALCULATED EA. HR
AS THE AVG OF THE PAST 12 OPERATING
HRS

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 09/02/2001 for the period 08/04/2000 through 08/03/2001

**Condition 26: Handling, storage, and disposal of volatile organic
compounds
Effective between the dates of 08/04/2000 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 234.6

Item 26.1:



New York State Department of Environmental Conservation

Permit ID: 7-3136-00054/00006

Facility DEC ID: 7313600054

This Condition applies to Emission Unit: 1-PRINT
Process: PRT

Item 26.2:

The following is prohibited:

- (a) using open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or ink/coating removal;
- (b) storage in open containers of spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;
- (c) use of open containers to store or dispose of inks and/or surface coatings; or
- (d) use of open containers to store or dispense inks and/or surface coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

Condition 27: Compliance Demonstration

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.3(b)

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT Emission Point: 00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.150 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



New York State Department of Environmental Conservation

Permit ID: 7-3136-00054/00006

Facility DEC ID: 7313600054

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 28: Compliance Demonstration

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PRINT Emission Point: 00001

Process: PRT Emission Source: 0000A

Item 28.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Opacity Requirement

Parameter Monitored: OPACITY

Upper Permit Limit: 10.0 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

New York State Department of Environmental Conservation

Permit ID: 7-3136-00054/00006

Facility DEC ID: 7313600054



STATE ONLY ENFORCEABLE CONDITIONS

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

Condition 29: General Provisions

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 29.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 29.2:

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.

Item 29.3:

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.

Condition 30: Emission Unit Definition

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 30.1:

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

Emission Unit: 1-PRINT

Emission Unit Description:

TWO PACKAGING ROTOGRAVURE PRINTING LINES
WITH VOC EMISSIONS EXHAUSTED TO TWO THERMAL
OXIDIZERS WITH A SINGLE EXHAUST STACK,
EITHER OR BOTH OXIDIZERS CAN BE OPERATED AT
ANY ONE TIME DEPENDING ON LOADING.

Building(s): MAIN



New York State Department of Environmental Conservation

Permit ID: 7-3136-00054/00006

Facility DEC ID: 7313600054

Condition 31: Contaminant List

Effective between the dates of 08/04/2000 and Permit Expiration Date

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

Item 31.1:

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

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

Condition 32: Air pollution prohibited

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 32.1:

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 33: Emission Point Definition By Emission Unit

Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 33.1:

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

Emission Unit: 1-PRINT

Emission Point: 00001

Height (ft.): 58

Diameter (in.): 72

New York State Department of Environmental Conservation

Permit ID: 7-3136-00054/00006

Facility DEC ID: 7313600054



Building: MAIN

Condition 34: Process Definition By Emission Unit
Effective between the dates of 08/04/2000 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 34.1:

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

Emission Unit: 1-PRINT

Process: PRT

Source Classification Code: 4-05-005-11

Process Description:

TWO BOBST LEMANIC 1150, 8-COLOR
ROTOGRAVURE PRINTING PRESSES WITH DIE
CUTTER FOR MANUFACTURING BOXBOARD CARTONS
ARE OPERATED IN A PRESS ROOM. VOC
EMISSIONS FROM INKS AND COATINGS ARE DUCTED
TO TWO TEC SYSTEMS OXIDIZERS AND THEN
EXHAUSTED TO ATMOSPHERE THROUGH A SINGLE
STACK. EITHER ONE OR BOTH OXIDIZERS CAN BE
OPERATED AT ANY ONE TIME DEPENDING ON THE
VOC LOADING AND AIR FLOW DEMANDS FROM THE
TWO PRESSES. ALL EMISSIONS FROM THIS
PROCESS ARE FROM A SINGLE POINT, INCLUDING
PRODUCTS OR COMBUSTION OF NATURAL GAS.

Emission Source/Control: 0000A - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT
EXCHANGER

Emission Source/Control: 0000B - Control

Control Type: DIRECT FLAME AFTERBURNER WITH HEAT
EXCHANGER

Emission Source/Control: 0000C - Process