



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 8-2614-00117/00038
Mod 0 Effective Date: 09/11/2006 Expiration Date: 09/10/2011
Mod 1 Effective Date: 01/12/2009 Expiration Date: 01/11/2014

Permit Issued To: AMERICAN PACKAGING CORP
777 DRIVING PARK AVE
ROCHESTER, NY 14613-1541

Facility: AMERICAN PACKAGING CORP
777 DRIVING PARK AVE
ROCHESTER, NY 14613

Contact: THOMAS RINGELSTETTER
AMERICAN PACKAGING CORP
777 DRIVING PARK AVE
ROCHESTER, NY 14613
(585) 254-9500

Description:
Modification of the Title V Facility Permit originally issued March 10, 1999 and renewed September 11, 2006 for operations manufacturing specialty printed paper and plastic film packaging for the food industry. This facility meets the definition of a major facility in 6 NYCRR Part 201-2.1(b)(21), and is subject to Title V regulations due to emissions of volatile organic compounds in excess of 250 tons per year.

Existing facility operations include extrusion, ozone treatment, and printing operations in Emission Unit A-00001, and flexographic and rotogravure packaging printing and coating operations using solvent based and water based inks in Emission Unit A-00002.

This modification authorizes a facility expansion adding a new extrusion laminating and coating line, with ozone substrate treatment, in a new Emission Unit A-00003. It includes conditions to limit potential VOC emissions from the new Emission Unit to 35 tons per year, below the 40 ton per year VOC emission increase threshold in 6 NYCRR Part 231-2 New Source Review in Ozone Transport Regions regulations.

According to the terms of a Consent Order, the modified Permit maintains a 200 ton per year VOC emission limit for Emission Unit A-00001 and a Part 228 and Part 234 VOC RACT variance limit for a solvent based ink printing and coating process in Emission Unit A00002, restricting VOC emissions from that process to 57.4 tons per year.



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: DAVID L BIMBER
 DIVISION OF ENVIRONMENTAL PERMITS
 6274 EAST AVON LIMA RD
 AVON, NY 14414-9519

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of Applications for Permit Modification or Renewal -REGION 8 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS



DEC GENERAL CONDITIONS

**** General Provisions ****

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 1-1: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6NYCRR 621.11

Item 1-1.1:

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 1-1.2:

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 1-1.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 3: Applications for Permit Renewals and Modifications

Applicable State Requirement: 6NYCRR 621.13

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 1-2: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6NYCRR 621.13

Item 1-2.1:

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 and Revocations by the Department

Applicable State Requirement: 6NYCRR 621.14

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 Applications for Permit Modification or Renewal -REGION 8 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 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(716) 226-2466

Condition 1-3: Submission of application for permit modification or renewal-REGION 8

HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 1-3.1:

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

NYSDEC Regional Permit Administrator
Region 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(716) 226-2466



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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ROCHESTER, NY 14613-1541

Facility: AMERICAN PACKAGING CORP
777 DRIVING PARK AVE
ROCHESTER, NY 14613

Authorized Activity By Standard Industrial Classification Code:
2671 - PAPER COATED AND LAMINATED PACKAGING

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Facility Level

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Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

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



- 28 6NYCRR 228.5(b): Compliance Certification
- 29 6NYCRR 228.5(c): Compliance Certification
- 30 6NYCRR 228.5(d): Department Access to Obtain Samples
- 1-9 6NYCRR 228.5(f): Compliance Certification
- 31 6NYCRR 228.5(i): Compliance Certification
- 32 6NYCRR 228.5(j): Compliance Certification
- 33 6NYCRR 228.5(k): Compliance Certification
- 34 6NYCRR 228.6: Prohibition of sale
- 1-10 6NYCRR 228.7: Compliance Certification
- 35 6NYCRR 228.10: Compliance Certification
- 1-3 6NYCRR 234.3(a)(1): Compliance Certification
- 1-5 6NYCRR 234.3(e): Compliance Certification
- 1-7 6NYCRR 234.4(b)(2): Compliance Certification
- 37 6NYCRR 234.4(b)(3): Compliance Certification
- 1-8 6NYCRR 234.4(b)(4): Compliance Certification
- 38 6NYCRR 234.5(a): Prohibition of Sale or Specification
- 39 6NYCRR 234.6: Compliance Certification
- 40 40CFR 63.10(b)(3), Subpart A: Compliance Certification
- 1-2 40CFR 63.830(b)(1), Subpart KK: Compliance Certification

Emission Unit Level

- 41 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 42 6NYCRR 201-6: Process Definition By Emission Unit
- 1-11 6NYCRR 201-7: Emission Unit Permissible Emissions

EU=A-00001

- 43 6NYCRR 228.3(a): Compliance Certification

EU=A-00001,Proc=EXT,ES=BCTEX

- 1-12 6NYCRR 228.3(a): Compliance Certification
- 47 6NYCRR 228.3(a): Compliance Certification
- 1-13 6NYCRR 228.3(b): Compliance Certification

EU=A-00001,Proc=EXT,ES=BCTEX

- 49 6NYCRR 228.5(e)(2): Demonstration of efficiency other than VOC/solvent recovery

EU=A-00002,Proc=FLS

- 1-14 6NYCRR 228.3(e)(1): Compliance Certification
- 56 6NYCRR 228.3(e)(1): Compliance Certification
- 58 6NYCRR 234.3(f)(1): Compliance Certification
- 59 6NYCRR 234.3(f)(1): Compliance Certification

EU=A-00002,Proc=FLW,ES=GRAUV

- 61 6NYCRR 228.7: Compliance Certification

EU=A-00003

- *1-15 6NYCRR 201-7: Capping Monitoring Condition

EU=A-00003,Proc=EX2

- 1-16 6NYCRR 228.3(a): Compliance Certification

EU=A-00003,Proc=PRT,ES=PRTSL

- 1-17 6NYCRR 234.3(a)(3): Compliance Certification



STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 62 ECL 19-0301: Contaminant List
- 63 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 64 6NYCRR 211.2: Air pollution prohibited
- 1-18 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

(1) An emergency occurred and that the facility owner and/or

operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department

within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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



- Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**



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

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

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

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

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

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

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



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

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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



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

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

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 200.6

Item 1.1:

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 2: Fees
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 201-6.5(a)(7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 09/11/2006 and 01/11/2014

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

Item 3.1:

The following information must be included in any required compliance monitoring records and reports:



- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

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

Effective between the dates of 09/11/2006 and 01/11/2014

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

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification

Effective between the dates of 09/11/2006 and 01/11/2014

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to



the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for



deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. 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. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

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



Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.
- iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual



compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

6274 East Avon-Lima Road
Avon, NY 14414-9519

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 202-2.5



Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

**Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 09/11/2006 and 01/11/2014**

Applicable Federal Requirement:6NYCRR 215

Item 9.1:

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

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

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

**Condition 10: Maintenance of Equipment
Effective between the dates of 09/11/2006 and 01/11/2014**

Applicable Federal Requirement:6NYCRR 200.7

Item 10.1:

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

**Condition 11: Recycling and Salvage
Effective between the dates of 09/11/2006 and 01/11/2014**

Applicable Federal Requirement:6NYCRR 201-1.7



Item 11.1:

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

Condition 1-1: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement:6NYCRR 201-1.8

Item 1-1.1:

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 12: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 09/11/2006 and 01/11/2014

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

Item 13.1:

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

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 09/11/2006 and 01/11/2014

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

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon



request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 15: Standard Requirement - Provide Information
Effective between the dates of 09/11/2006 and 01/11/2014

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

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 201-6.5(a)(8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 201-6.5(d)(5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:



(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 09/11/2006 and 01/11/2014

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

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 211.3

Item 20.1:



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

Condition 21: Accidental release provisions.
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:40CFR 68

Item 21.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
 - b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.
- Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:40CFR 82, Subpart F

Item 22.1:

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

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

Condition 23: Emission Unit Definition
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 201-6



Item 23.1(From Mod 1):

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

Emission Unit: A-00001

Emission Unit Description:

EXTRUDERS AND OZONE TREATERS AND PRINTING
OPERATIONS.

Building(s): MAIN

Item 23.2(From Mod 1):

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

Emission Unit: A-00002

Emission Unit Description:

FLEXOGRAPHIC AND PACKAGING ROTOGRAVURE
PRINTING AND COATING.

Building(s): MAIN

Item 23.3(From Mod 1):

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

Emission Unit: A-00003

Emission Unit Description:

PAPER AND PLASTICS FILM TO BE USED FOR
PACKAGING ARE COATED USING EXTRUDED PRIMERS
AND POLYETHYLENE RESINS. ALSO, PAPER AND
FILM ARE TREATED WITH HIGH VOLTAGE
ELECTRICITY AND OZONATOR.

Condition 24: Compliance Certification

Effective between the dates of 09/11/2006 and 01/11/2014

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

Item 24.1:

The Compliance Certification activity will be performed for the Facility.

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

I. Protocol Applicability

A. This protocol addresses procedures for utilizing new coating systems under 6 NYCRR Part228.3(d)(1). This protocol is intended to outline the compliance evaluation and recordkeeping American Packaging will conduct to utilize new coating systems at Emission Unit: A-00001, Process EXT.



B. This protocol does not apply to the following changes:

1. Any significant permit modification as that term is defined in 6 NYCRR 201-6.7(d); or
2. Any change that would exceed the emissions allowable under the permit whether expressed as a rate or in terms of total emissions.

II. Protocol

A. Criteria

1. American Packaging shall evaluate use of new coating systems under this protocol in accordance with the following criteria:

- a. Whenever a new potential coating system is identified, American Packing will evaluate the status of the new coating system per the requirements of 6 NYCRR Part 228.3(d).
- b. American Packaging will calculate the emission differential (ED) for the new coating system per the formula provided in 6 NYCRR Part 228.3(d)(3). Physical parameters for the new coating system will be obtained from the coating supplier/manufacturer that verifies the parameters used to determine the ED.
- c. If the ED for the new potential coating system is greater than zero, the proposed coating system will not be utilized.
- d. If the ED for the new proposed coating system is equal or less than zero, American Packaging will document the calculations and place the new coating into production as necessary.

B. Notification Requirements for Changes Reviewed under Protocol

1. American Packaging will maintain records/documentation of the ED calculations for any new coating system. These records will be maintained on-site for Department review upon request.
2. American Packaging will also maintain records of purchase, dates of usage and as applied usage amounts including any solvents for each new coating system implemented under this protocol.
3. American Packaging shall provide with the semi-annual monitoring report, a summary of the changes made in



accordance with this protocol during the corresponding period and a statement of the compliance status of each.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 25: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

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

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

I. Protocol Objective

The objective of this condition is to maximize operational flexibility at the facility by building into the Title V permit the capability to make certain changes using a protocol. As provided under 6 NYCRR Part 201-6.5(f)(2), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.7.

II. Protocol

A. Criteria

1. Changes reviewed under this protocol shall be evaluated in accordance with the following criteria:

a. All underlying federal and state requirements with which the new or changed emission source must comply must exist in the Title V permit. Existing permit conditions may be amended to reference or include the new or changed emission source and any related information, and/or subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.

b. Any new or changed emission source shall not be part



of a source project that results in a significant net emissions increase that exceeds the New Source Review (NSR) thresholds identified in 6 NYCRR Part 231-2 or 40 CFR 52.21.

c. The facility shall not use the protocol to make physical changes or changes in the method of operation of existing emissions sources that would require a new or modified federally enforceable cap either the avoid major NSR requirements or to address and comply with other Clean Air Act requirements, such as RACT. Such changes must be addressed via the significant permit modification provisions.

B. Notification Requirements for Changes Reviewed under the Protocol

1. The facility shall notify the Department in writing of the proposed change.

2. Notifications made in accordance with this protocol will include the following documentation:

a. Identification of the Title V permit emission unit, process(es), emission sources and emission points affected by the proposed change with applicable revisions to the Emission Unit structure;

b. Description of the proposed change, including operating parameters;

c. Identification and description of emissions control technology;

d. Documentation of the project's, or emission source's, compliance with respect to all state and/or federally applicable requirements, including the following steps:

i. Calculate the emission rate potential and maximum projected actual annual emission rates for all contaminants affected by the change.

ii. Submit documentation of major NSR program non-applicability for NYSDEC review and approval.

iii. Identify and evaluate the applicability of all regulations likely to be triggered by the new or changed emission source.

iv. Propose any operating and record keeping procedures necessary to ensure compliance.



e. Any other relevant information used for the evaluation of the proposed project or emission source under the Protocol.

C. Review and Approval of Changes

1. The Department shall respond to the permittee in writing with a determination within 15 days of receipt of the notification of the permittee.
2. The Department may require a permit modification, in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to notification do not meet the criteria under II. A above or that the changes may have a significant air quality impact or be otherwise potentially significant under SEQRA (6 NYCRR Part 617).
3. The Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.

D. Additional Compliance Obligations for Changes Made Under this Protocol

1. upon commencement of the change, the facility shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with II.A.1.a above.
2. The facility shall provide with the semi-annual monitoring report, a summary of the changes made in accordance with this protocol and a statement of the compliance status of each. Changes reported should include all those made during the corresponding period and any earlier changes that have not yet been incorporated into the permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 1-4: Compliance Certification



Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.3(d)

Replaces Condition(s) 45

Item 1-4.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001

Process: EXT

Emission Unit: A-00003

Process: EX2

Item 1-4.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A coating line which utilizes a coating system a control strategy, which control strategy may also employ as a control device, must comply with the following provisions:

- (1) the coating system must be approved by the department prior to the use of the coating system in the manufacture of a product for sale;
- (2) coatings which are applied manually by handheld spray guns cannot be utilized in the coating system;
- (3) the emission differential (ED) for a coating system must be determined using the formula below. The ED for the coating system is the sum of the individual ED values calculated for every coating used in the coating system. The ED calculation requirement is to be performed each time the series of coatings in a coating system is changed. The coating system ED must be less than or equal to zero before the coating system may be operated.

$$ED = \frac{\sum (V_n)_c [(VOC)_a - (VOC)_c]}{\sum (V_n)_c}$$

Equation 7

where:

V is the actual coating volume used, minus water and excluded VOC, in gallons



η is the overall removal efficiency, expressed as:

$$\eta = \frac{\eta_c \times \eta_d}{10,000} \quad \text{Equation 8}$$

η_c is the percent CE, as determined by paragraph 228.5(e)(2) of this 6 NYCRR.

η_d is the percent destruction and/or removal efficiency, as determined by Paragraph 228.5(f) of 6 NYCRR.

$\eta = 0$, for coating systems without a control device and capture system

$dVOC = 7.36$ pounds of VOC per gallon of VOC when $(VOC)_a = 0$ and $(Vn)_a = 1$

When paragraph 228.5(e)(1) of 6 NYCRR applies, η is the VOC solvent recovery fraction.

All other terms are defined in 6 NYCRR 228.3(c).

(4) the ED figures for the individual coating used in the coating system must be calculated on an instantaneous basis. There is no averaging period for individual coatings which are part of a coating system; and

(5) the method or instrument by which the owner or operator will measure or calculate the volume of coating applied must be approved by the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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

Condition 1-6: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.4

Replaces Condition(s) 26

Item 1-6.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001

Emission Point: 00004

Emission Unit: A-00001

Emission Point: 00005



Emission Unit: A-00001	Emission Point: 00009
Emission Unit: A-00001	Emission Point: 00010
Emission Unit: A-00001	Emission Point: 00011
Emission Unit: A-00001	Emission Point: THOX1
Emission Unit: A-00003	Emission Point: 00032
Emission Unit: A-00003	Emission Point: 00033
Emission Unit: A-00003	Emission Point: 00034
Emission Unit: A-00003	Emission Point: 00035
Emission Unit: A-00003	Emission Point: 00036
Emission Unit: A-00001	Emission Point: 00020
Emission Unit: A-00001	Emission Point: 00021
Emission Unit: A-00001	Emission Point: 00030
Emission Unit: A-00001	Emission Point: 00031

Item 1-6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee 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 investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated



with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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

Condition 27: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.5(a)

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the Department and, upon request, these records must be submitted to the Department. Any facility required to perform the overall removal efficiency calculation, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance must be provided to the



Department in a format acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 28: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.5(b)

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner and operator of any emission source subject to 6NYCRR Part 228, must use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, respectively (see table 1, section 200.9 of Title 6), 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 29: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.5(c)

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

When the sampling and analysis methods referenced in subdivisions (b) or (f) or paragraph (e)(2) of 6 NYCRR 228.5 are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the Department and the Administrator.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 30: Department Access to Obtain Samples
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.5(d)

Item 30.1:

Representatives of the Department must be permitted during reasonable business hours, to obtain coating samples for the purpose of determining compliance with 6NYCRR Part 228.

Condition 1-9: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.5(f)

Replaces Condition(s) 44, 53

Item 1-9.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00001

Process: EXT

Emission Unit: A-00003

Process: EX2

Emission Unit: A-00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-9.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner and/or operator of a surface coating process



must follow 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 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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

Condition 31: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.5(i)

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each ED calculation performed under Part 228.3(d) , 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.5(j)

Item 32.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 6NYCRR Part 228 must be reported to the Department within 30 days following notice or generation of the information or record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 33: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.5(k)

Item 33.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required by 6NYCRR Part 228 must be maintained at the facility for five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.



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

Condition 34: Prohibition of sale
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.6

Item 34.1:

(A) No person shall sell, specify, or require for use the application of a coating on a part or product at a facility with a coating line described in table 1 or 2 in section 228.7 or 228.8 of 6 NYCRR 228 if such use is prohibited by any of the provisions of this Part. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at this facility. This prohibition shall not apply to the following:

(1) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in tables 1 and 2 of sections 228.7 or 228.8 of 6 NYCRR Part 228;

(2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in section 228.3(d) of 6 NYCRR Part 228; and

(3) coatings utilized at surface coating lines that have been granted variances for reasons of technological and economic feasibility per section 228.3(e) of 6 NYCRR Part 228.

(B) Any person selling a coating for use in a coating line subject to this Part must, upon request, provide the user with certification of the VOC content of the coating supplied.

Condition 1-10: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.7

Replaces Condition(s) 46

Item 1-10.1:

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

Emission Unit: A-00001
Process: EXT

Emission Unit: A-00003
Process: EX2

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

Item 1-10.2:

Compliance Certification shall include the following monitoring:



Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Paper coating lines may contain a maximum of 2.9 pounds of VOC (minus water and excluded VOC) per gallon of coating as applied, unless a coating system meeting the requirements of Part 228.3(d) is utilized.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: As required by Part 228.5

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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

Condition 35: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.10

Item 35.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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



minimize VOC evaporation;

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

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

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

(g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:

(1) an enclosed spray gun cleaning system that is kept closed when not in use;

(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

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

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

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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



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

Condition 1-5: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement: 6NYCRR 234.3(e)

Replaces Condition(s) 36

Item 1-5.1:

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

Emission Unit: A-00001	Emission Point: THOX1
Emission Unit: A-00003	Emission Point: 00032
Emission Unit: A-00003	Emission Point: 00037
Emission Unit: A-00001	Emission Point: 00004
Emission Unit: A-00001	Emission Point: 00009
Emission Unit: A-00002	Emission Point: 00007
Emission Unit: A-00002	Emission Point: 00008

Item 1-5.2:

Compliance Certification 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 10 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee 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 investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment



within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 10 percent
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 1-7: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement: 6NYCRR 234.4(b)(2)

Replaces Condition(s) 51, 54

Item 1-7.1:

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

Emission Unit: A-00001
Process: GWP

Emission Unit: A-00003
Process: PRT

Emission Unit: A-00002

Item 1-7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings and printing inks are presented in Appendix A, methods 24 and 24A respectively, of 40 CFR 60. Alternate analytical methods for surface coating and printing ink analysis must be



approved by the commissioner and the USEPA. Instead of an ink solvent/volatile analysis, the commissioner may accept certification from the ink manufacturer of the composition of the ink solvent/volatiles, if supported by actual batch records.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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

Condition 37: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 234.4(b)(3)

Item 37.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks, VOC and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the Department's representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the Commissioner's representative in a format acceptable to him or her. Records must be maintained at the facility for a period of five years.

The facility shall maintain the following records for each ink, cleaning solvent, and other VOC used in the printing process, on a monthly basis:

1. The brand and product name or code for the material.
2. The quantity of material used during the calendar month.
3. The VOC content of the material.

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the monthly log are to be kept on site.



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 1-8: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

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

Replaces Condition(s) 52, 55

Item 1-8.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: A-00002

Emission Unit: A-00001

Process: GWP

Emission Unit: A-00003

Process: PRT

Item 1-8.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The results of any analysis or other procedure used for establishing compliance must be provided to the commissioner's representative. Representatives of the department shall be permitted, during reasonable business hours, to obtain ink and/or fountain solution samples for the purpose of determining compliance with 6NYCRR Part 234.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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

Condition 38: Prohibition of Sale or Specification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 234.5(a)

Item 38.1:



No person shall sell, specify, or require for use, the application of a coating or ink on a substrate at a facility with a printing process subject to the volatile organic compound control requirements of 6 NYCRR Part 234 if such use is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which any coating or ink is to be applied to any substrate at any affected facility. This prohibition shall not apply to the following:

(1) coatings and/or inks utilized at printing processes where control equipment has been installed to achieve compliance;

(2) coatings and/or inks utilized at printing processes that have been granted variances for reasons of technological and economic feasibility.

Condition 39: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement: 6NYCRR 234.6

Item 39.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following work practices are 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.

To ensure that these work practices are not in use, the facility will conduct daily inspections for the presence



of any open containers as described in the prohibitions above and maintain a log book of these inspections. Any such open containers shall be closed immediately. The log book should include the following information at a minimum:

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

necessary.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 40: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:40CFR 63.10(b)(3), Subpart A

Item 40.1:

The Compliance Certification activity will be performed for the Facility.

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate the facility's area source status for 40CFR63 Subpart KK and Subpart JJJJ, facility wide HAP usage and emissions shall be calculated on a monthly basis and incorporated into a twelve month rolling total, expressed in tpy. Emissions shall be calculated for both individual HAP and total HAPs. Records of the mass of all HAP containing materials used, the mass fraction of HAP present in each HAP containing material used at the facility, and other supporting document used in the HAP emissions calculation shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 1-2: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement:40CFR 63.830(b)(1), Subpart KK



Item 1-2.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-2.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to this subpart shall submit the reports specified below to the Administrator:

(1) An initial notification required in Sec. 63.9(b).

(i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in Sec. 63.826(a).

(ii) Initial notifications for new and reconstructed sources shall be submitted as required by Sec. 63.9(b).

(iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under Sec. 63.9(b), provided the same information is contained in the permit application as required by Sec. 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(iv) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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

**** Emission Unit Level ****

**Condition 41: Emission Point Definition By Emission Unit
Effective between the dates of 09/11/2006 and 01/11/2014**

Applicable Federal Requirement:6NYCRR 201-6

**Item 41.1(From Mod 1):**

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

Emission Unit: A-00001

Emission Point: 00004

Height (ft.): 40 Length (in.): 36 Width (in.): 25
 NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN

Emission Point: 00005

Height (ft.): 40 Length (in.): 36 Width (in.): 25
 NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN

Emission Point: 00009

Height (ft.): 40 Length (in.): 27 Width (in.): 20
 NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN

Emission Point: 00010

Height (ft.): 40 Length (in.): 27 Width (in.): 20
 NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN

Emission Point: 00011

Height (ft.): 40 Length (in.): 36 Width (in.): 24
 NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN

Emission Point: 00020

Height (ft.): 40 Diameter (in.): 12
 NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN

Emission Point: 00021

Height (ft.): 29 Diameter (in.): 12
 NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN

Emission Point: 00030

Height (ft.): 29 Diameter (in.): 14
 NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN

Emission Point: 00031

Height (ft.): 29 Diameter (in.): 14
 NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN

Emission Point: THOX1

Height (ft.): 30 Diameter (in.): 48

Item 41.2(From Mod 1):

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

Emission Unit: A-00002

Emission Point: 00007

Height (ft.): 24 Length (in.): 18 Width (in.): 18
 NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN



Emission Point: 00008
Height (ft.): 24 Length (in.): 18 Width (in.): 18
NYTMN (km.): 4784.421 NYTME (km.): 284.629 Building: MAIN

Item 41.3(From Mod 1):

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

Emission Unit: A-00003

Emission Point: 00032
Height (ft.): 65 Length (in.): 17 Width (in.): 17

Emission Point: 00033
Height (ft.): 65 Length (in.): 20 Width (in.): 20

Emission Point: 00034
Height (ft.): 53 Diameter (in.): 12

Emission Point: 00035
Height (ft.): 53 Diameter (in.): 12

Emission Point: 00036
Height (ft.): 53 Diameter (in.): 16

Emission Point: 00037
Height (ft.): 53 Diameter (in.): 16

**Condition 42: Process Definition By Emission Unit
Effective between the dates of 09/11/2006 and 01/11/2014**

Applicable Federal Requirement:6NYCRR 201-6

Item 42.1(From Mod 1):

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

Emission Unit: A-00001
Process: EXT Source Classification Code: 4-02-013-01
Process Description:
PAPER AND PLASTIC FILM ARE COATED USING
SOLVENT-BASED EXTRUDER PRIMERS AND
MELTED/EXTRUDED POLYETHYLENE RESINS.

Emission Source/Control: THOX1 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: BCTEX - Process

Emission Source/Control: BELEX - Process

Item 42.2(From Mod 1):

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

Emission Unit: A-00001



Process: GWP Source Classification Code: 4-05-005-01
Process Description:
GRAVURE AND WOLVERINE (BELOIT) IN-LINE
PRINTING OPERATIONS WITH WATER BASED INKS.

Emission Source/Control: GWP01 - Process

Item 42.3(From Mod 1):

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

Emission Unit: A-00001
Process: OZO Source Classification Code: 4-02-999-97
Process Description:
PAPER AND FILM ARE TREATED WITH HIGH
VOLTAGE ELECTRICITY IN THE OZONE TREATERS.
BELOIT HAS 2 OZONE TREATERS #1 EXHAUSTS
THROUGH EP# 00020 AND #2 THROUGH EP# 00005.
BCT HAS 4 OZONE TREATERS ALL EXHAUST
THROUGH EP #00011.

Emission Source/Control: 10018 - Process

Emission Source/Control: 1016A - Process

Emission Source/Control: 1016B - Process

Emission Source/Control: 1017A - Process

Emission Source/Control: 1017B - Process

Emission Source/Control: I0019 - Process

Item 42.4(From Mod 1):

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

Emission Unit: A-00002
Process: FLS Source Classification Code: 4-05-003-11
Process Description:
FLEXOGRAPHIC AND ROTOGRAVURE PRINTING AND
COATING USING SOLVENT BASED INKS.

Emission Source/Control: FLEXO - Process

Emission Source/Control: GRAUV - Process

Item 42.5(From Mod 1):

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

Emission Unit: A-00002
Process: FLW Source Classification Code: 4-05-003-11
Process Description:
FLEXOGRAPHIC AND ROTOGRAVURE PRINTING AND
COATING USING WATER BASED INKS.



Emission Source/Control: FLEXO - Process

Emission Source/Control: GRAUV - Process

Item 42.6(From Mod 1):

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

Emission Unit: A-00003

Process: EX2

Source Classification Code: 4-02-013-01

Process Description:

Paper and plastic film to be used for packaging are coated using solvent-based extruded primers. Melted/extruded polyethylene resins are applied as needed. The two extruder stations will also have dry bond laminating capabilities to apply adhesives.

Emission Source/Control: SAMEX - Process

Item 42.7(From Mod 1):

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

Emission Unit: A-00003

Process: OZ2

Source Classification Code: 4-02-999-97

Process Description:

Paper and film are treated with high voltage electricity. There will be three 15KW Corona Treater stations on the line, each with its own exhaust stack. Additionally there are plans to use an Ozonator on the line.

Emission Source/Control: I0021 - Process

Emission Source/Control: I0022 - Process

Emission Source/Control: I0023 - Process

Emission Source/Control: I0024 - Process

Item 42.8(From Mod 1):

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

Emission Unit: A-00003

Process: PRT

Source Classification Code: 4-05-003-11

Process Description:

In-Line Printing Operations, with water based inks (PRTWA) and solvent based inks (PRTSL).

Emission Source/Control: PRTSL - Process

Emission Source/Control: PRTWA - Process

Condition 1-11: Emission Unit Permissible Emissions

Effective between the dates of 01/12/2009 and 01/11/2014



Applicable Federal Requirement:6NYCRR 201-7

Item 1-11.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited

shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: A-00003

CAS No: 0NY998000 (From Mod 1)

Name: VOC

PTE(s): 70,000 pounds per year

Condition 43: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.3(a)

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 43.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In accordance with the requirements contained within Consent Order No. R8-20030729-22, the annual VOC emissions from Emission Unit A00001 are limited to 200 tons per year on a rolling twelve-month basis. In order to verify compliance with the emission limit, the facility shall calculate VOC emissions from Emission Unit A-00001 for each month based upon material usage and the VOC removal efficiency of the exhaust system and the control equipment. The VOC emissions shall be calculated by material balance as described in the American Packaging Monitoring Plan ζ Emissions Unit A-00001. The content of the American Packaging Monitoring Plan ζ Emissions Unit A-00001 and the records required to demonstrate compliance with the plan are subject to Department approval. Records and supporting documentation shall be maintained on site for five years and be made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 200 tons per year



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 1-12: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.3(a)

Item 1-12.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-00001

Process: EXT

Emission Source: BCTEX

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-12.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to ensure compliance with the VOC emission cap for Emission Unit A-00001, the thermal oxidizer (Emission Source ID THOX1) will be used on an as-needed basis to control the VOC emissions from the coating operations at the BCT extruder. The facility shall operate and maintain the thermal oxidizer consistent with good engineering practice and in accordance with the manufacturer's recommendations. During operation, the operating temperature of the oxidizer shall be monitored continuously and maintained at a minimum of 1600 degrees F at center bed thermocouple. The facility shall maintain monthly records of maintenance performed on the control equipment. Monitoring and maintenance records shall be kept on site for five years and made available to the Department upon request.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1600 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



Reports due 30 days after the reporting period.
The initial report is due 7/30/2009.
Subsequent reports are due every 6 calendar month(s).

Condition 47: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.3(a)

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-00001

Process: EXT

Emission Source: BCTEX

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall operate and maintain the exhaust system at the BCT extruder consistent with good engineering practice and in accordance with the manufacturer's recommendations. The Permanent Total Enclosure (PTE) at BCT #2 primming station shall be monitored to ensure that the criteria for the PTE are continually met during normal operations. On a weekly basis, the static pressures within the BCT #1 primming station exhaust duct connected to the thermal oxidizer shall be monitored to verify that exhaust conditions are similar to those measured during the capture efficiency test. The facility shall maintain monthly records of maintenance performed on the exhaust system. Monitoring and maintenance records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 1-13: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.3(b)



equipment.

Condition 1-14: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.3(e)(1)

Replaces Condition(s) 57

Item 1-14.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-00002

Process: FLS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-14.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

American Packaging shall continue to investigate compliance strategies and document the evaluation of either reformulation, abatement technology or process modification. Evaluation of compliant inks and overlacquers shall be performed according to the schedule outlined in the VOC RACT Ink/Overlacquer Assessment Plan dated October 4, 2004. The dates and results of the evaluation shall be documented in a written report. Records shall be kept on site for five years and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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

Condition 56: Compliance Certification
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.3(e)(1)

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-00002

Process: FLS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



Item 56.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

This process (FLS) is subject to 6 NYCRR Part 228.3(e)(1) and Part 234.3(f)(1) Reasonably Available Control Technology (RACT) requirements for emissions of Volatile Organic Compounds (VOC). The RACT determination is to be re-evaluated every five years. The first of such re-evaluations was submitted to the Department in January 2001. American Packaging completed and submitted a revised Part 228 and Part 234 RACT report for Department's review and approval in July 2004. The Department has completed its review of the report and established a revised RACT limit for Process FLS at 57.4 tons per year on a rolling twelve-month basis. In order to verify compliance with the emission limitation, the facility shall calculate the VOC emissions from the usage of Part 228 and Part 234 noncompliant coatings and inks at this process. VOC emissions shall be calculated monthly and incorporated into a twelve-month rolling total. Records shall be maintained in a format acceptable to the Department, kept on site for five years, and made available to the Department upon request.

The next re-evaluation of this RACT determination shall be submitted no later than five years from date of issue of this condition, or prior to any changes that could significantly impact the existing approved RACT evaluation.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 57.4 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 58: Compliance Certification

Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 234.3(f)(1)

Item 58.1:

The Compliance Certification activity will be performed for:



Emission Unit: A-00002

Process: FLS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 58.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This process (FLS) is subject to 6 NYCRR Part 228.3(e)(1) and Part 234.3(f)(1) Reasonably Available Control Technology (RACT) requirements for emissions of Volatile Organic Compounds (VOC). The RACT determination is to be re-evaluated every five years. The first of such re-evaluations was submitted to the Department in January 2001. American Packaging completed and submitted a revised Part 228 and Part 234 RACT report for Department's review and approval in July 2004. The Department has completed its review of the report and established a revised RACT limit for Process FLS at 57.4 tons per year on a rolling twelve-month basis. In order to verify compliance with the emission limitation, the facility shall calculate the VOC emissions from the usage of Part 228 and Part 234 noncompliant coatings and inks at this process. VOC emissions shall be calculated monthly and incorporated into a twelve-month rolling total. Records shall be maintained in a format acceptable to the Department, kept on site for five years, and made available to the Department upon request.

The next re-evaluation of this RACT determination shall be submitted no later than five years from date of issue of this condition, or prior to any changes that could significantly impact the existing approved RACT evaluation.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INK, AS APPLIED, INCLUDING SOLVENTS

Parameter Monitored: VOC

Upper Permit Limit: 57.4 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 59: Compliance Certification

Effective between the dates of 09/11/2006 and 01/11/2014



Applicable Federal Requirement:6NYCRR 234.3(f)(1)

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-00002

Process: FLS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 59.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

American Packaging shall continue to investigate compliance strategies and document the evaluation of either reformulation, abatement technology or process modification. Evaluation of compliant inks and overlacquers shall be performed according to the schedule outlined in the VOC RACT Ink/Overlacquer Assessment Plan dated October 4, 2004. The dates and results of the evaluation shall be documented in a written report. Records shall be kept on site for five years and made available to the Department upon request. A new testing schedule for compliant inks and overlacquers shall be submitted for the Department's approval no later than March 2007.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 61: Compliance Certification

Effective between the dates of 09/11/2006 and 01/11/2014

Applicable Federal Requirement:6NYCRR 228.7

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-00002

Process: FLW

Emission Source: GRAUV

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 61.2:



Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Paper coating lines may contain a maximum of 2.9 pounds of VOC (minus water and excluded VOC) per gallon of coating as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: As required by Part 228.5

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 1-15: Capping Monitoring Condition
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable Federal Requirement:6NYCRR 201-7

Item 1-15.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 231-2

Item 1-15.2:

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

Item 1-15.3:

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 1-15.4:

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 1-15.5:

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 1-15.6:

The Compliance Certification activity will be performed for:

Emission Unit: A-00003

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

Item 1-15.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

In order to cap out of the requirements of 6NYCRR Part 231-2.2, the facility shall limit the VOC emissions from Emission Units A-00003 to less than 35 tons per year on a rolling twelve month basis.

To demonstrate compliance with the above emission limit, the facility shall maintain monthly records on the rolling twelve month VOC emissions from Emission Unit A-00003. VOC emissions shall be calculated using material balance based on production records and emission factors. Emission factors and assumptions used in the calculation are subject to Department approval. Records shall be kept on site for five years and made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 70000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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

Condition 1-16: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014



Applicable Federal Requirement:6NYCRR 228.3(a)

Item 1-16.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-00003

Process: EX2

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-16.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to ensure compliance with the VOC emission cap for Emission Unit A-00003, the thermal oxidizer (Emission Unit A-00001, Emission Source ID THOX1) will be used on an as-needed basis to control the VOC emissions from the coating operations at the extruder (Emission Source ID SAMEX). The facility shall operate and maintain the thermal oxidizer consistent with good engineering practice and in accordance with the manufacturer's recommendations. During operation, the operating temperature of the oxidizer shall be monitored continuously and maintained at a minimum of 1600 degrees F at center bed thermocouple. The facility shall maintain monthly records of maintenance performed on the control equipment. Monitoring and maintenance records shall be kept on site for five years and made available to the Department upon request.

Within 60 days of the start-up of Emission Source SAMEX, the facility shall conduct a stack test for the thermal oxidizer to determine the VOC control efficiency for both Emission Sources SAMEX and BCTEX. The facility shall follow the notification and reporting requirements for emissions testing as specified in 6 NYCRR Part 202-1.2 and Part 202-1.3.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1600 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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



Condition 1-17: Compliance Certification
Effective between the dates of 01/12/2009 and 01/11/2014

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

Item 1-17.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-00003

Process: PRT

Emission Source: PRTSL

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The capture system and the air cleaning device must provide for an overall reduction in volatile organic compound emissions of at least: (i) 75.0 percent where a publication rotogravure process is employed; (ii) 65.0 percent where a packaging rotogravure is employed; (iii) 60.0 percent where a flexographic printing process is employed; (iv) the overall removal efficiency is determined by testing the capture efficiency and the removal efficiency of the control equipment, utilizing test methods acceptable to the commissioner.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2009.

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



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

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

Condition 62: Contaminant List
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable State Requirement:ECL 19-0301

Item 62.1:

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

CAS No: 0NY998-00-0

Name: VOC

Condition 63: Unavoidable noncompliance and violations



Effective between the dates of 09/11/2006 and 01/11/2014

Applicable State Requirement: 6NYCRR 201-1.4

Item 63.1:

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 64: Air pollution prohibited
Effective between the dates of 09/11/2006 and 01/11/2014

Applicable State Requirement:6NYCRR 211.2

Item 64.1:

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

Condition 1-18: Emissions from new emission sources and/or modifications
Effective between the dates of 01/12/2009 and 01/11/2014

Applicable State Requirement:6NYCRR 212.4(a)

Replaces Condition(s) 65, 66

Item 1-18.1:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

New York State Department of Environmental Conservation

Permit ID: 8-2614-00117/00038

Facility DEC ID: 8261400117

