

New York State Department of Environmental Conservation
Facility DEC ID: 8262600038



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit 8-2626-00038/00038
Mod 0 Effective Date: 03/20/2000 Expiration Date: 03/20/2005
Mod 1 Effective Date: 03/26/2001 Expiration Date: 03/20/2005
Mod 2 Effective Date: 07/16/2002 Expiration Date: 03/20/2005

Permit Issued To: CRYOVAC INC
PO BOX 464
100 ROGERS BRIDGE RD
DUNCAN, SC 29334

Contact: DAN WILLIAMS
CRYOVAC INC
100 ROGERS BRIDGE RD - PO BOX 464
DUNCAN, SC 29334-0464

Facility: CRYOVAC INC
1525 BROOKS AVE
ROCHESTER, NY 14624

Contact: CAROL S WILSON
1525 BROOKS AVE
ROCHESTER, NY 14624-3545
(585) 436-3211

Description:

Mod 2: This modification reflects the revised Part 231 analysis that proposes to ensure the reduction of the PTE for VOCs to under 40 tons per year.. This new cap will be accomplished by limiting the hours of run time for Press 7 to 4,900 and Laminator 2-Deck 1 to 5,600 hours per year, respectively.

This modification also standardizes the reporting requirements to calendar annual dates rather than on the anniversary dates.

Mod 1: The modification consists of the following: 1) the removal of Press 5; 2) the installation of a new press (Press #7); 3) the use of solvent adhesives on Laminator 2- Deck 1; 4) the redirection of Parts Washer emissions from Catalytic Oxidizer 2 to Catalytic Oxidizer 4; and 5) the elimination of the OxyDry process. The project constitutes a modification under Part 231, due to an increase in the PTE for VOC. As such, a Project Emission Potential has been calculated. The calculation contemplates a Federally Enforceable Cap of 5,600 hours of run time for Press 7 and adhesive deck #1 of Laminator 2. With this cap, the Project Emission Potential is calculated at 39.3 tons per year of VOC, as outlined in the



New York State Department of Environmental Conservation
Facility DEC ID: 8262600038

calculations dated October 26, 2000. The Facility Permit already includes a previously approved VOC emissions cap for a 1997 modification that limited the hours of operation of Press 2, Press 6 and Laminator 2- Deck 22. The modification to the Title V permit therefore consists of the addition of this Part 231 emission cap, and changes to the facility information database reflecting the changes in #1-5, above.

Initial Title V Permit: the initial Title V permit for this facility, which manufactures specialty packaging systems primarily for the food industry, consists of three Emission Units: U-00001, U-00002 & U-00003. The facility processes polyolefin resin pellets into plastic films. Activities associated with polyolefin film extrusion and corona treatment at the six extruders are covered by Emission Unit U-00001. Activities associated with the flexographic printing and coating onto the plastic film roll-stock on six wide web printing presses is covered by Emission Unit U-00002. Included in Emission Unit U-00002 are the six flexographic printing presses, application of corn starch powder, and an automated parts cleaning operation. The emissions from the printing presses and automated parts cleaning operation are treated by three catalytic oxidizers between April 1 and October 31. Particulates from the application of corn starch powder are controlled by filter fabrics. Activities associated with the surface coating application of laminating adhesives and specialty coatings to the plastic film roll-stock are included in Emission Unit U-00003. Laminator 1 uses only non-solvent coatings. Laminator 2 has the capability to use solvent coatings and when solvent coatings are used, the emissions of Volatile Organic Compounds (VOCs) will be treated with a catalytic oxidizer.

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
 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 permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and 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



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 2-1: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 2-1.1:

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 2-1.2:

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 2-1.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute,



New York State Department of Environmental Conservation
Facility DEC ID: 8262600038

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(a)

Expired by Mod No: 2

Item 3.1:

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

Item 3.2:

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

Condition 2-2: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 2-2.1:

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. The grounds for modification, suspension or revocation include:

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



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

7Condition 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



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: CRYOVAC INC

PO BOX 464
100 ROGERS BRIDGE RD
DUNCAN, SC 29334

Contact: DAN WILLIAMS

CRYOVAC INC
100 ROGERS BRIDGE RD - PO BOX 464
DUNCAN, SC 29334-0464

Facility:

CRYOVAC INC
1525 BROOKS AVE
ROCHESTER, NY 14624

Contact: CAROL S WILSON

1525 BROOKS AVE
ROCHESTER, NY 14624-3545
(585) 436-3211

Authorized Activity By Standard Industrial Classification Code:

2671 - PAPER COATED AND LAMINATED PACKAGING

3081 - UNSUPPORTED PLASTICS FILM AND SHEET

Mod 0 Permit Effective Date: 03/20/2000

Permit Expiration Date: 03/20/2005

Mod 1 Permit Effective Date: 03/26/2001

Permit Expiration Date: 03/20/2005

Mod 2 Permit Effective Date: 07/16/2002

Permit Expiration Date: 03/20/2005



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 24 Emission Unit Definition
- 2-1 Recordkeeping and reporting of compliance monitoring
- 2-2 Monitoring, Related Recordkeeping, and Reporting Requirements.
- 1-4 Compliance Certification
- 2-3 Compliance Certification
- 2-4 Compliance Certification
- 27 Compliance Certification
- 28 Recordkeeping requirements
- 2-5 Compliance Certification
- 2-6 Accidental release provisions.

Emission Unit Level

- 33 Emission Point Definition By Emission Unit
- 34 Process Definition By Emission Unit
- 2-7 Compliance Certification (EU=U-00002)
- 2-8 Compliance Certification (EU=U-00002,Proc=CON)
- 2-9 Compliance Certification (EU=U-00003)
- 2-10 Compliance Certification (EU=U-00003,Proc=LAM)

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 2-11 Contaminant List
- 2-12 Unavoidable noncompliance and violations
- 39 Air pollution prohibited



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: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



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

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

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

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

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 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

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

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

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 201-1.8

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

Item H: 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 I: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 201-3.2(a)

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

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



requirements, regulations, or law.

Item J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)

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

Item K: 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 L: 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 M: 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 N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



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 O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

The permittee 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. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR 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 Q: 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 R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



facility 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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Item T: 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 U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. 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.

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



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 provisions 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 in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

Item W: 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

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



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 X: 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

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



a shorter time period in the case of an emergency.

Item Y: Required Emission Tests - 6 NYCRR Part 202-1.1

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

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item AA: Open Fires - 6 NYCRR Part 215

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

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

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



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

FEDERAL APPLICABLE REQUIREMENTS

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

Condition 24: Emission Unit Definition

Effective between the dates of 03/20/2000 and 03/20/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 24.1(From Mod 2):

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

Emission Unit: U-00001

Emission Unit Description:

EXTRUSION OF POLYOLEFIN FILM. ACTIVITIES RESULTING IN EMISSIONS ARE CORONA TREATMENT AT EACH OF SIX EXTRUDERS (ONE TREATER EACH AT EXTRUDERS 2-4 AND 6, TWO EACH AT EXTRUDERS 1 AND 5) WHICH GENERATES OZONE, THREE WALL FANS AND TWO CEILING FANS.

Building(s): 1

Item 24.2(From Mod 2):

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

Emission Unit: U-00002

Emission Unit Description:

FLEXOGRAPHIC PRINTING AND COATING ONTO PLASTIC FILM ROLL STOCK ON SIX PRESSES GENERATING VOC EMISSIONS THAT ARE TREATED BY OXIDIZERS PART OF THE YEAR, AND CORONA TREATMENT AT SOME PRESSES.
IN THE 2000 MODIFICATION:

1. EXISTING PRESS 5 (SOURCE PRE05) WILL BE REMOVED WITH ITS TREATER (EMISSION SOURCE

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



T1P05) AND A NEW PRESS (PRE07) WILL BE INSTALLED AND CONNECTED TO EXISTING CATALYTIC OXIDIZER 2 (SOURCE CAT02). PRESS 7 WILL HAVE ONE CORONA TREATER (NEW EMISSION SOURCE T1P07) THAT GENERATES OZONE.

2. AN EXISTING PARTS CLEANING OPERATION (WAS01) WILL BE MODIFIED TO REDIRECT AIR EMISSIONS FROM CO2 TO CO4 (SOURCE CAT04 IN U00003).

3.OXYDRY APPLICATION ON PRESSES 3, 4 AND 5 CEASES SO ASSOCIATED EMISSION POINTS (P45DC, P03DC, 4BAGS, 07BAG) AND SOURCES (DCP03, DCP45) ARE BEING ELIMINATED.

Building(s): 1

Item 24.3(From Mod 2):

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

Emission Unit: U-00003

Emission Unit Description:

SURFACE COATING TO APPLY LAMINATING ADHESIVES AND SPECIALTY COATINGS TO PLASTIC FILM ROLL STOCK ON TWO LAMINATORS. LAMINATOR 2 WILL CHANGE OPERATIONS SO THAT IT CAN RUN SOLVENT BASED COATINGS ON BOTH OF ITS DECKS. VOC EMISSIONS FROM ADHESIVE DECK 1 (SOURCE LAM2A) WILL BE TREATED JANUARY THROUGH NOVEMBER BY CATALYTIC OXIDIZER CO2 WHEN RUNNING VOC-BASED ADHESIVES, AND VOC EMISSIONS FROM COATING DECK 2(SOURCE LAM2B) WILL BE TREATED YEAR-ROUND BY CATALYTIC OXIDIZER CO4. THE PREVIOUS COMPLIANCE CERTIFICATION LIMIT OF 7200 HOURS PER YEAR READY TIME NOW WILL REFER ONLY TO COATING DECK 2 (SOURCE LAM2B.) A SEPARATE COMPLIANCE CERTIFICATION LIMIT OF 5600 HOURS OF RUN TIME PER YEAR FOR COATING DECK 1 (SOURCE LAM2A) IS BEING ESTABLISHED IN A SEPARATE PERMIT CONDITION.

Building(s): 1

Condition 2-1: Recordkeeping and reporting of compliance monitoring Effective between the dates of 07/16/2002 and 03/20/2005



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

Item 2-1.1:

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 2-2: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 07/16/2002 and 03/20/2005

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

Item 2-2.1:

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 1-4: Compliance Certification

Effective between the dates of 03/26/2001 and 03/20/2005

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

Item 1-4.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-4.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



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.

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 Compliance Monitoring and Enforcement (BCME) 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 7/30/01.

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

Condition 2-3: Compliance Certification

Effective between the dates of 07/16/2002 and 03/20/2005

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



Item 2-3.1:

The Compliance Certification activity will be performed for the Facility.

Item 2-3.2:

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 or a toxic 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.

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



(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 any of the above conditions 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) through (4) 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 paragraph (1) through (4) of this section must also be identified in the 6 month monitoring report required above.

If the permittee seeks to have a violation excused as provided in 201-1.4, the permittee shall report such violations as required under 201-1.4(b). However, in no case may reports of any deviation be on a less frequent basis than those described in paragraphs (1) through (4) above. 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.

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

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



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 Compliance Monitoring and Enforcement (BCME) 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 1/30/03.
Subsequent reports are due every 6 calendar month(s).

Condition 2-4: Compliance Certification
Effective between the dates of 07/16/2002 and 03/20/2005

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

Item 2-4.1:

The Compliance Certification activity will be performed for the Facility.

Item 2-4.2:

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

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



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 Compliance Monitoring and Enforcement (BCME) 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 BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

and Enforcement
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 1/30/03.
Subsequent reports are due on the same day each year

Condition 27: Compliance Certification
Effective between the dates of 03/20/2000 and 03/20/2005

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Item 27.2:

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 28: Recordkeeping requirements
Effective between the dates of 03/20/2000 and 03/20/2005

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 28.1:

(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 2-5: Compliance Certification

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



Effective between the dates of 07/16/2002 and 03/20/2005

Applicable Federal Requirement: 6NYCRR 231-2.

Item 2-5.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

PRESSES 2 AND 6 (EMISSION SOURCES PRE02 AND PRE06), AND LAMINATOR 2 (EMISSION SOURCE LAM02) ARE EACH LIMITED TO 7200 HOURS OF OPERATION PER YEAR. COMPLIANCE WILL BE DEMONSTRATED BY THE MAINTENANCE OF RECORDS WHICH REFLECT TOTAL HOURS OF OPERATION, AND MAINTENANCE OF A ROLLING 12-MONTH SUMMARY OF TOTAL HOURS OF OPERATION FOR THESE SOURCES. THE RECORDS WILL BE KEPT IN THE FORMAT SHOWN IN THE JUNE 24, 1997 SUBMISSION (MODIFIED JULY 3, 1997.) THIS LIMITATION WILL EFFECTIVELY CAP THIS SOURCE IN SUCH A WAY THAT THE PROJECT EMISSION POTENTIAL (PEP) OF THE MODIFICATIONS LISTED IN CRYOVAC'S SUBMISSIONS OF MAY 8, 1997 AND JUNE 24, 1997 (MODIFIED JULY 3, 1997) WILL NOT EXCEED THE SIGNIFICANT SOURCE PROJECT THRESHOLD (SSPT) FOR VOCs, AS THOSE TERMS ARE DEFINED IN 6NYCRR, PART 231. THE PROJECT IS DESCRIBED BY CORRECTED INFORMATION SUBMITTED JULY 9, 1999. FUTURE POTENTIAL OF THE ABOVE PROJECT IS CALCULATED AS 173 TPY, AND PAST ACTUAL EMISSIONS WERE 141.2 TPY, RESULTING IN A PEP OF 31.8 TPY.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/03.

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



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

**Condition 2-6: Accidental release provisions.
Effective between the dates of 07/16/2002 and 03/20/2005**

Applicable Federal Requirement: 40CFR 68.

Item 2-6.1:

If a chemical is listed in Table 1 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, 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 (if not previously submitted) one of the following if such quantities are present at the time of permit issuance:
 - 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:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866
ATTN: Accidental Release Program contact

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

**Condition 33: Emission Point Definition By Emission Unit
Effective between the dates of 03/20/2000 and 03/20/2005**

Applicable Federal Requirement: 6NYCRR 201-6.

Item 33.1(From Mod 2):

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

Emission Unit:	U-00001		
Emission Point:	E01T1		
Height (ft.):	43	Diameter (in.):	6
			Building: 1
Emission Point:	E02T1		
Height (ft.):	43	Diameter (in.):	6
			Building: 1



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

Emission Point: E03T1 Height (ft.): 43	Diameter (in.): 6	Building: 1
Emission Point: E04T1 Height (ft.): 44	Diameter (in.): 6	Building: 1
Emission Point: E05T1 Height (ft.): 44	Diameter (in.): 8	Building: 1
Emission Point: E05T2 Height (ft.): 44	Diameter (in.): 8	Building: 1
Emission Point: E06T1 Height (ft.): 46	Diameter (in.): 12	Building: 1

Item 33.2(From Mod 2):

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

Emission Unit: U-00002		
Emission Point: 01CAT Height (ft.): 43	Diameter (in.): 30	Building: 1
Emission Point: 02CAT Height (ft.): 41	Diameter (in.): 34	Building: 1
Emission Point: 03CAT Height (ft.): 41	Diameter (in.): 34	Building: 1
Emission Point: 07BAG Height (ft.): 23	Diameter (in.): 24	Building: 1
Emission Point: 4BAGS Height (ft.): 22	Diameter (in.): 36	Building: 1
Emission Point: DISF1 Height (ft.): 36	Diameter (in.): 18	



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

Emission Point: DUCS1 Height (ft.): 36	Diameter (in.): 12	Building: 1
Emission Point: P01F1 Height (ft.): 14	Diameter (in.): 39	Building: 1
Emission Point: P01S1 Height (ft.): 36	Diameter (in.): 20	Building: 1
Emission Point: P01T1 Height (ft.): 41	Diameter (in.): 6	Building: 1
Emission Point: P02S1 Height (ft.): 36	Diameter (in.): 24	Building: 1
Emission Point: P02T1 Height (ft.): 45	Diameter (in.): 8	Building: 1
Emission Point: P02T2 Height (ft.): 45	Diameter (in.): 6	Building: 1
Emission Point: P03DC Height (ft.): 25	Diameter (in.): 6	Building: 1
Emission Point: P03S1 Height (ft.): 26	Diameter (in.): 18	Building: 1
Emission Point: P04S1 Height (ft.): 26	Diameter (in.): 18	Building: 1
Emission Point: P05S1 Height (ft.): 36	Diameter (in.): 18	Building: 1
Emission Point: P05T1 Height (ft.): 38	Diameter (in.): 6	Building: 1



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

			Building: 1
Emission Point: P06S1			
Height (ft.): 36	Diameter (in.): 24		Building: 1
Emission Point: P06T1			
Height (ft.): 45	Diameter (in.): 8		Building: 1
Emission Point: P06T2			
Height (ft.): 45	Diameter (in.): 6		Building: 1
Emission Point: P07S1			
Height (ft.): 36	Diameter (in.): 18		Building: 1
Emission Point: P07T1			
Height (ft.): 45	Diameter (in.): 6		Building: 1
Emission Point: P45DC			
Height (ft.): 29	Diameter (in.): 24		Building: 1
Emission Point: PREF1			
Height (ft.): 10	Diameter (in.): 36		Building: 1
Emission Point: PREF2			
Height (ft.): 10	Diameter (in.): 36		Building: 1
Emission Point: PREF3			
Height (ft.): 14	Diameter (in.): 32		Building: 1
Emission Point: WACF1			
Height (ft.): 36	Diameter (in.): 18		Building: 1
Emission Point: WUCS1			
Height (ft.): 36	Diameter (in.): 12		Building: 1

17

Item 33.3(From Mod 2):



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

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

Emission Unit:	U-00003		
Emission Point:	04CAT		
Height (ft.):	38	Length (in.): 26	Width (in.): 24
			Building: 1
Emission Point:	L01F1		
Height (ft.):	14	Diameter (in.): 36	
			Building: 1
Emission Point:	L01S1		
Height (ft.):	30	Diameter (in.): 10	
			Building: 1
Emission Point:	L01T1		
Height (ft.):	29	Diameter (in.): 10	
			Building: 1
Emission Point:	L01T2		
Height (ft.):	29	Diameter (in.): 10	
			Building: 1
Emission Point:	L02S1		
Height (ft.):	36	Diameter (in.): 18	
			Building: 1
Emission Point:	L02T1		
Height (ft.):	45	Diameter (in.): 6	
			Building: 1
Emission Point:	L02T2		
Height (ft.):	45	Diameter (in.): 10	
			Building: 1
Emission Point:	L02T3		
Height (ft.):	45	Diameter (in.): 6	
			Building: 1

Condition 34: Process Definition By Emission Unit
Effective between the dates of 03/20/2000 and 03/20/2005

Applicable Federal Requirement: 6NYCRR 201-6.

Item 34.1(From Mod 2):

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



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

Emission Unit: U-00001

Process: TRE

Source Classification Code: 3-99-999-92

Process Description:

TREATMENT OF EXTRUDED PLASTIC FILM USING
IN-LINE CORONA-POWERED TREATMENT SYSTEMS
WHICH GENERATE OZONE FROM THE ELECTRIC ARC
PRODUCED.

Emission Source/Control: T1E01 - Process

Emission Source/Control: T1E02 - Process

Emission Source/Control: T1E03 - Process

Emission Source/Control: T1E04 - Process

Emission Source/Control: T1E05 - Process

Emission Source/Control: T1E06 - Process

Emission Source/Control: T2E01 - Process

Emission Source/Control: T2E05 - Process

Item 34.2(From Mod 2):

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

Emission Unit: U-00002

Process: CON

Source Classification Code: 4-05-003-01

Process Description:

FLEXOGRAPHIC PRINTING AND COATING ONTO
PLASTIC FILM ROLL-STOCK WITH EMISSION
CONTROL AT LEAST 7 MONTHS PER YEAR. AS
PART OF THE 2000/2001 MODIFICATION,
EXISTING PRESS 5 IS TO BE REMOVED AND NEW
PRESS 7 INSTALLED.

Emission Source/Control: CAT01 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: CAT02 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: CAT03 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: PRE01 - Process



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

Emission Source/Control: PRE02 - Process

Emission Source/Control: PRE03 - Process

Emission Source/Control: PRE04 - Process

Emission Source/Control: PRE06 - Process

Emission Source/Control: PRE07 - Process

Item 34.3(From Mod 2):

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

Emission Unit: U-00002

Process: TRP

Source Classification Code: 3-99-999-92

Process Description:

TREATMENT OF PLASTIC FILM USING IN-LINE CORONA-POWERED TREATMENT SYSTEMS, WHICH GENERATE OZONE FROM THE ELECTRIC ARC PRODUCED. AS PART OF THE 2000/2001 MODIFICATION, THE TREATER FOR PRESS 5 IS TO BE REMOVED AND A NEW TREATER FOR PRESS 7 ADDED.

Emission Source/Control: T1P01 - Process

Emission Source/Control: T1P02 - Process

Emission Source/Control: T1P03 - Process

Emission Source/Control: T1P06 - Process

Emission Source/Control: T1P07 - Process

Emission Source/Control: T2P02 - Process

Emission Source/Control: T2P06 - Process

Item 34.4(From Mod 2):

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

Emission Unit: U-00002

Process: UNC

Source Classification Code: 4-05-003-01

Process Description:

FLEXOGRAPHIC PRINTING AND COATING ONTO PLASTIC FILM ROLL-STOCK WITHOUT EMISSION CONTROL UP TO 5 MONTHS PER YEAR. AS PART OF THE 2000/2001 MODIFICATION, EXISTING



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

PRESS 5 IS TO BE REMOVED AND NEW PRESS 7
INSTALLED.

Emission Source/Control: PRE01 - Process

Emission Source/Control: PRE02 - Process

Emission Source/Control: PRE03 - Process

Emission Source/Control: PRE04 - Process

Emission Source/Control: PRE06 - Process

Emission Source/Control: PRE07 - Process

Item 34.5(From Mod 2):

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

Emission Unit: U-00002

Process: WAC

Source Classification Code: 3-01-018-19

Process Description:

EQUIPMENT CLEANING STATION; SOLVENT IS USED TO CLEAN INK FROM PRESS PARTS, AND DIRTY SOLVENT/INK MIXTURES ARE TREATED TO DISTILL AND RECLAIM SOLVENT FOR REUSE. VOC EMISSIONS OCCUR DURING 5 MINUTES OF EACH 20-MINUTE WASH CYCLE. VOC EMISSIONS ARE CAPTURED AND TREATED BY A CATALYTIC OXIDIZER (CO2) AT LEAST DURING THE PERIOD OF APRIL 1 THROUGH OCTOBER 31. ROOM AIR FROM THE STILL ROOM IS VENTED THROUGH A STACK. THIS PROCESS OPERATED FROM APRIL 1 THROUGH OCTOBER 31. AS PART OF THE 2000/2001 MODIFICATION, EMISSIONS ARE TO BE REDIRECTED FROM CATALYTIC OXIDIZER 2 TO CATALYTIC OXIDIZER 4, WHICH OPERATES YEAR ROUND. CAT04 WILL THUS BE SHARED BETWEEN EMISSION UNITS 2 AND 3.

Emission Source/Control: WAS01 - Process

Item 34.6(From Mod 2):

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

Emission Unit: U-00003

Process: LAM

Source Classification Code: 4-02-044-35

Process Description:

SURFACE COATING TO APPLY LAMINATING



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

ADHESIVES AND SPECIALTY COATINGS TO PLASTIC FILM ROLL STOCK ON TWO LAMINATORS. AS PART OF THE 2000/2001 MODIFICATIONS, LAMINATOR 2 WILL BE ABLE TO RUN SOLVENT BASED COATINGS ON BOTH ITS DECKS. VOC FROM ADHESIVE DECK 1 WILL BE TREATED JANUARY THROUGH NOVEMBER IN CATALYTIC OXIDIZER 2, AND VOC FROM COATING DECK 2 WILL BE TREATED YEAR ROUND IN CATALYTIC OXIDIZER 4.

Emission Source/Control: LAM01 - Process

Emission Source/Control: LAM2A - Process

Emission Source/Control: LAM2B - Process

Item 34.7(From Mod 2):

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

Emission Unit: U-00003

Process: TRL

Source Classification Code: 3-99-999-92

Process Description:

TREATMENT OF PLASTIC FILM USING IN-LINE CORONA-POWERED TREATMENT SYSTEMS WHICH GENERATE OZONE FROM THE ELECTRIC ARC PRODUCED.

Emission Source/Control: T1L01 - Process

Emission Source/Control: T1L02 - Process

Emission Source/Control: T2L01 - Process

Emission Source/Control: T2L02 - Process

Emission Source/Control: T3L02 - Process

Item 34.8(From Mod 0):

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

Emission Unit: U-00002

Process: OXY

Source Classification Code: 3-99-999-92

Process End Date: 12/1/00

Process Description:

IN-LINE APPLICATION OF OXYDRY POWDER (A FOOD-GRADE CORNSTARCH-LIKE MATERIAL) TO CERTAIN PLASTIC FILM PRODUCTS GOING THROUGH PRESSES, AS A DRYING AGENT TO PREVENT



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

ADHESION OF PRINTED FILM. OXYDRY IS CAPTURED AND CONTROLLED USING TORIT DUST COLLECTION UNITS PLUS FUGITIVE (TRIVIAL) AMOUNTS GO TO VENTS IN THE BAGMAKING DEPARTMENT.

Emission Source/Control: DCP03 - Control
Control Type: FABRIC FILTER

Emission Source/Control: DCP45 - Control
Control Type: FABRIC FILTER

Emission Source/Control: PRE03 - Process

Emission Source/Control: PRE04 - Process

Emission Source/Control: PRE05 - Process

Item 34.9(From Mod 0):

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

Emission Unit: U-00002

Process: WUC

Source Classification Code: 3-01-018-19

Process End Date: 12/1/00

Process Description:

SOLVENT/INK RECLAMATION UNIT WITH AN EQUIPMENT CLEANING STATION. SOLVENT IS USED TO CLEAN INK FROM PRESS PARTS, AND DIRTY SOLVENT/INK MIXTURES ARE TREATED TO DISTILL AND RECLAIM SOLVENT FOR REUSE. VOC EMISSIONS OCCUR DURING 5 MINUTES OF EACH 20-MINUTE WASH CYCLE. ROOM AIR IS VENTED THROUGH A STACK. THIS PROCESS OPERATES WITHOUT EMISSION CONTROL, FROM NOVEMBER 1 THROUGH MARCH 31.

Emission Source/Control: WAS01 - Process

Condition 2-7: Compliance Certification

Effective between the dates of 07/16/2002 and 03/20/2005

Applicable Federal Requirement: 6NYCRR 231-2.

Replaces Condition(s) 1-5

Item 2-7.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00002

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



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

Item 2-7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Press 7 shall be limited to 4900 hours of run time (not press ready time as other presses are), to ensure that the 2000/2001 modification results in a project emission potential of less than 40 tpy of VOC. Emission calculations, dated 10/26/2000, are attached to the permit application. The 4900 hours press run time combines time operating under the processes CON and UNC.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/03.

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

Condition 2-8: Compliance Certification

Effective between the dates of 07/16/2002 and 03/20/2005

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

Item 2-8.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00002

Process: CON

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-8.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

550 degree catalyst temperature to be maintained at emission sources CAT01 through CAT03 (catalytic oxidizers servicing process CON) between April 1 and October 31, while there is a solvent loading from the presses vented



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

to these oxidizers and/or from the laminator 2 adhesive deck. Thermocouples used to monitor temperature shall be calibrated once per year during the first calendar quarter.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 550 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
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 1/30/03.
Subsequent reports are due every 6 calendar month(s).

Condition 2-9: Compliance Certification
Effective between the dates of 07/16/2002 and 03/20/2005

Applicable Federal Requirement: 6NYCRR 231-2.

Item 2-9.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00003

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

Item 2-9.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Laminator 2, adhesive deck #1 shall be limited to 5600 hours of run time annually (not ready time as deck #2 is limited.) This will ensure a project emission potential of less than 40 tpy of VOC for the 2000/2001 modification. Emission calculations are attached to the application, dated 10/26/2000.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/03.
Subsequent reports are due every 12 calendar month(s).

Condition 2-10: Compliance Certification



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

Effective between the dates of 07/16/2002 and 03/20/2005

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

Item 2-10.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00003

Process: LAM

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-10.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

550 degree catalyst temperature to be maintained at emission source CAT04 (catalytic oxidizer servicing process LAM) while emission source LAM2B is in solvent based mode, and/or when the parts washer (emission source WAS01) is emitting solvent. Thermocouples used to monitor temperature shall be calibrated once per year during the first calendar quarter.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

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 1/30/03.

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 only enforceable and are not subject to annual compliance certification requirements for Title V permits.

Condition 2-11: Contaminant List

Effective between the dates of 07/16/2002 and 03/20/2005

Applicable State Requirement: ECL 19-301.

Item 2-11.1:

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



New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038

CAS No: 0NY998-00-0

Name: VOC

Condition 2-12: Unavoidable noncompliance and violations

Effective between the dates of 07/16/2002 and 03/20/2005

Applicable State Requirement: 6NYCRR 201-1.4

Item 2-12.1:

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

New York State Department of Environmental Conservation

Permit ID: 8-2626-00038/00038

Facility DEC ID: 8262600038



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 39: Air pollution prohibited
Effective between the dates of 03/20/2000 and 03/20/2005

Applicable State Requirement: 6NYCRR 211.2

Item 39.1:

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.