

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 8322400108**



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 8-3224-00108/00116  
Effective Date: 02/28/2001 Expiration Date: 02/28/2006

Permit Issued To: PACTIV CORPORATION  
1900 WEST FIELD CT  
LAKE FOREST, IL 60045

Facility: PACTIV CORPORATION  
5250 NORTH ST  
CANANDAIGUA, NY 14424-1095

Contact: RICHARD J. ST. JAMES  
PACTIV CORP.  
5250 NORTH ST  
CANANDAIGUA, NY 14424-1095

**Description:**

Initial Title V permit for an existing foam packaging production plant, Standard Industrial Classification (SIC) Code 3086, which consists of the following emission units:

U-DENSI, a thermal densifier to collapse polystyrene;  
U-FOAMS, polystyrene foam extrusion, storage, and thermoforming operations;  
U-OPSEX, extrusion ovens;  
U-PYROL, a pyrolysis oven used for die cleaning;  
U-SILIC, silicone coating operations,  
U-SOLID, solid materials handling systems, including scrap handling; and  
U-SURFA, plastic coating operations.

This permit also maintains an existing 6 NYCRR Part 212 Volatile Organic Compound (VOC) Reasonably Available Control Technology (RACT) variance, to allow the operation of the foam extruders, thermoforming operations, and foam roll storage operations, without emission controls. This variance is based on excessive cost for emissions controlled, of over \$3000 per ton.

Additionally, material throughput to 2 existing foam extrusion lines is being restricted by permit conditions, to maintain VOC emission levels from each line below the 40 ton per year threshold of 6 NYCRR Part 231, based on new information indicating existing control equipment efficiency of 94 rather than 95 percent.

Finally, besides previously permitted emission sources, this permit also includes the addition of a new foam extrusion line. VOC emissions from this new process are being restricted, by permit conditions limiting throughput, to below the 40 ton per year threshold of 6 NYCRR Part 231 New Source Review in

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Ozone Transport Regions.

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: PETER A. LENT  
6274 EAST AVON LIMA RD  
AVON, NY 14414-9519

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_\_



**Notification of Other 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, agents, and assigns for all claims, suits, actions, damages, and costs of every name and description, arising out of or resulting from the permittee's undertaking of activities or operation and maintenance of the facility or facilities authorized by the permit in compliance or non-compliance with the terms and conditions of the permit.

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

**Facility Level**

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



**DEC GENERAL CONDITIONS**

**\*\*\*\* General Provisions \*\*\*\***

**Condition 1: Facility Inspection by the Department**  
**Applicable State Requirement: ECL 19-0305.**

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**  
**Applicable State Requirement: ECL 3-0301.2(m)**

**Item 2.1:**

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

**Condition 3: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13(a)**

**Item 3.1:**

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

**Item 3.2:**

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

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

**Item 4.1:**

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for

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modification, suspension or revocation include:

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

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 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



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**Permit Under the Environmental Conservation Law (ECL)**

**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

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CANANDAIGUA, NY 14424-1095

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

Permit Effective Date: 02/28/2001

Permit Expiration Date: 02/28/2006



**LIST OF CONDITIONS**

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- 63 VOL storage tanks from 10000 - 20000 gallons
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**FEDERALLY ENFORCEABLE CONDITIONS**  
**\*\*\*\* Facility Level \*\*\*\***

**Condition 1:      Sealing**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 200.5**

**Item 1.1:**

(a)      The commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the commissioner issued in the case of the violation. Sealing means labelling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

**Condition 2:      Acceptable ambient air quality**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 200.6**

**Item 2.1:**

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

**Condition 3:      Maintenance of equipment**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 200.7**

**Item 3.1:**

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



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**Condition 4: Unpermitted Emission Sources**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-1.2**

**Item 4.1:**

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

**Condition 5: Unavoidable Noncompliance and Violations**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-1.4**

**Item 5.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

- (a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit or certificate issued for the corresponding air contamination source. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.
- (b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.



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(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.

**Condition 6: Emergency Defense**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-1.5**

**Item 6.1:**

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

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

**Condition 7: Recycling and Salvage**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-1.7**



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**Item 7.1:**

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

**Condition 8: Prohibition of Reintroduction of Collected Contaminants to the Air**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-1.8**

**Item 8.1:**

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

**Condition 9: Public Access to Recordkeeping for Title V facilities**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-1.10(b)**

**Item 9.1:**

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.

**Condition 10: Proof of Eligibility**

**Effective between the dates of 02/28/2001 and 02/28/2006**

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

**Item 10.1:**

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

**Condition 11: Proof of Eligibility**

**Effective between the dates of 02/28/2001 and 02/28/2006**

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

**Item 11.1:**

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part



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

**Condition 12: Applicable Criteria, Limits, Terms, Conditions and Standards**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 12.1:**

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

- i. Any reporting requirements and operations under an accidental release plan, response plan, and compliance plan as approved as of the date of the permit issuance, or
- ii. Any support documents submitted as a part of the permit application for this facility as accepted and approved as of the date of permit issuance.

Any noncompliance with the federally-enforceable portions of this permit constitutes a violation of the federal Clean Air Act and will be grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

**Item 12.2:**

Any document, including reports, required by the federally-enforceable portions of this permit shall contain a certification by the responsible official for this facility as set forth in Section 201-6.3 that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

**Condition 13: Cessation or Reduction of Permitted Activity Not a Defense**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 13.1:**

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.

**Condition 14: Compliance Requirements**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**



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**Item 14.1:**

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 the responsible official, consistent with Section 201-6.3 of Part 201.

**Item 14.2:**

The permittee shall comply with the approved compliance schedule for this permit if such a schedule is a part of this permit. Risk management plans must be submitted to the Administrator if required by Section 112(r) of the Clean Air Act for this facility.

**Item 14.3:**

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.

**Condition 15: Federally-Enforceable Requirements**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 15.1:**

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



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only state regulations.

**Condition 16: Fees**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 16.1:**

The permittee shall pay the required fees associated with this permit.

**Condition 17: Monitoring, Related Recordkeeping and Reporting Requirements**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 17.1:**

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, 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 18: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 18.1:**

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 relieve the permittee from the requirement to comply with any condition contained in this permit.

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.

**Condition 19: Permit Shield**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

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**Item 19.1:**

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield. For those facilities for which a permit shield has been granted, 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.

**Condition 20: Property Rights**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 20.1:**

This permit does not convey any property rights of any sort or any exclusive privilege.

**Condition 21: Reopening for Cause**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 21.1:**

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.



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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.

**Item 21.2:**

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.

**Item 21.3:**

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.

**Condition 22: Right to Inspect**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 22.1:**

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 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.

**Condition 23: Severability**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 23.1:**



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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.

**Condition 24: Emission Unit Definition**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 24.1:**

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

Emission Unit: U-DENSI  
Emission Unit Description:  
THERMAL DENSIFIER.

Building(s): 2

**Item 24.2:**

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

Emission Unit: U-FOAMS  
Emission Unit Description:  
POLYSTYRENE FOAM PROCESSES

Building(s): 1  
2  
3  
5  
6  
7  
CARB  
OUTSIDE  
ROOF  
UND

**Item 24.3:**

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

Emission Unit: U-OPSEX  
Emission Unit Description:  
EXTRUSION LINES.

Building(s): 4

**Item 24.4:**

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

Emission Unit: U-PYROL  
Emission Unit Description:  
PYROLYSIS OVEN.

Building(s): 2



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**Item 24.5:**

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

Emission Unit: U-SILIC

Emission Unit Description:

COATING LINES, FUGITIVE SOURCE.

Building(s): 4

**Item 24.6:**

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

Emission Unit: U-SOLID

Emission Unit Description:

MATERIAL HANDLING OPERATIONS.

Building(s): 1  
4  
6  
BH  
OUTSIDE  
SILO

**Item 24.7:**

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

Emission Unit: U-SURFA

Emission Unit Description:

PLASTIC COATING OPERATIONS.

Building(s): 1

**Condition 25: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

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

**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:

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

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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 YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 26: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

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

**Item 26.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 26.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

Compliance certifications shall contain the following information:

- 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.

Compliance certifications shall be submitted annually. Certification reports are due 30 days after the end of the calendar year.

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



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and Enforcement  
50 Wolf Road  
Albany, NY 12233-3258

Reporting Requirements: ANNUALLY (CALENDAR YEAR)  
Reports due by January 30th for previous calendar year

**Condition 27: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

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

**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:

Operational Flexibility Plan

(1) Certain changes and modifications which meet the criteria under (i) - (iii) below may be conducted without prior approval of the Department and shall not require modification of the permit. The facility owner and/or operator must however maintain records of the date and description of such changes and make such records available for review by Department representatives upon request.

(i) changes that do not cause emissions to exceed any emission limitation contained in regulations or applicable requirements;

(ii) changes which do not cause the subject emission unit, emission source, process, or emission point to become subject to any additional regulations or requirements;

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

(2) In addition to the record keeping required under (b)(1) above, the permittee must notify the Department in writing at least 30 calendar days in advance of making changes involving:

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

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

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

(3) The Department may require a permit modification, in order to impose new applicable requirements or special permit conditions if it determines that changes proposed pursuant to notification under (2) above do not meet the criteria under (1) or the change may have a significant air quality impact. In such cases the Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the potential air quality impacts and/or applicable requirements. The Department shall respond to the permittee in writing with such a determination within 15 days of receipt of the 30 day advance notification from the permittee. The Department's determination shall include a listing of information necessary to further review the proposed change.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 28: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.5(g)**

**Item 28.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 28.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Non-Applicability:

This facility is not a major source of NOx, hence, no sources at this facility are subject to 6NYCRR Part

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227-2.

The natural gas combustion sources associated with the following listed processes are all less than 3 MMBtu/hr and are not subject to 6NYCRR Part 227-1:

Emission Unit U-FOAMS, Process CAS  
Emission Unit U-FOAMS, Process R01  
Emission Unit U-FOAMS, Process R02  
Emission Unit U-OPSEX, Process OPS

Emissions of volatile organic compounds which are not given an A rating from Process SIL of Emission Unit U-SILIC and from Process ATM of Emission Unit U-SURFA are subject to the VOC RACT requirements of 6NYCRR Part 228; not the VOC RACT requirements of 6NYCRR Part 212 or Part 234.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 29: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.5(g)**

**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:

Pactiv operates the following sources which are exempt from Title V permitting per 6NYCRR Part 201-3.2(c):

16 stationary or portable combustion installations where the furnace has a maximum rated heat input capacity <10MMBtu/hr burning fossil fuels, other than coal, and coal and wood fired stationary combustion units with a maximum heat input <1MMBtu/hr - this includes unit space heaters, which burn waste oils as defined in 6NYCRR Part 225-2 and generated on-site, alone or in conjunction with used oil generated by a do-it-yourself oil changer as defined in 6NYCRR Subpart 374-2.

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2 emergency power generating units installed for use when the usual sources of heat, power, water and lighting are temporarily unobtainable, or which are installed to provide power <500 hrs/yr and excluding those units under contract w/ a utility to provide peak shaving generation to the grid.

4 non-contact water cooling towers and water treatment systems for process cooling water and other water containers designed to cool, store or otherwise handle water that has not been in direct contact with gaseous or liquid process streams.

43 graphic arts processes which are specifically exempted from regulation under Part 234 with regard to emissions of VOC's which are not given an A rating.

1 abrasive cleaning operation which exhausts to an appropriate emission control device.

2 storage tanks, with capacities <10,000 gal, except those subject to either Part 229 or Part 233.

24 storage silos storing solid materials, provided all such silos are exhausted through an appropriate emission control device.

21 presses used exclusively for molding or extruding plastics except where halogenated carbon compounds or hydrocarbon solvents are used as foaming agents.

1 exhaust system for solvent transfer, filling or sampling and/or storage rooms provided the solvent stored in these locations are stored in closed containers when not in use.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 30: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-7.2(e)**

**Item 30.1:**



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The Compliance Certification activity will be performed for the Facility.

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 03/29/2002 for the period 02/28/2001 through 02/27/2002

**Condition 31: Required emissions tests**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 202-1.1**

**Item 31.1:**

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

**Condition 32: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 202-2.1**

**Item 32.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 32.2:**

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



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year.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR YEAR)

Reports due by April 15th for previous calendar year

**Condition 33: Recordkeeping requirements**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 202-2.5**

**Item 33.1:**

(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 34: Visible emissions limited.**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 211.3**

**Item 34.1:**

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 35: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)**

**Item 35.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**Item 35.2:**

Compliance Certification shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The source owner must continue to investigate compliance strategies and submit reports documenting the evaluation of either reformulation, abatement technology, or process modification. The written report must include the results and specific dates of the testing or evaluation. The name(s) of vendors which can independently verify the testing or engineering evaluation must also be supplied to the commissioner's representative.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 36: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)**

**Item 36.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

FACILITY VOC EMISSIONS WILL BE CAPPED AT 622 TONS PER YEAR. RECORDS OF ALL FACILITY VOC EMISSIONS WILL BE DETERMINED TO PROVE THAT THE ANNUAL EMISSIONS WILL BE LESS THAN THE CAP OF 622 TONS PER YEAR. RECORDS WILL BE MAINTAINED IN A FORMAT ACCEPTABLE TO THE DEPARTMENT. THIS CAP REDUCES THE FACILITY POTENTIAL TO EMIT TO A LEVEL THAT MAKES IT ECONOMICALLY INFEASIBLE TO CONTROL EMISSIONS FROM PROCESSES EX1, THE, AND RST.

Work Practice Type: PROCESS MATERIAL THRUPUT



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Process Material: VOC's

Upper Limit of Monitoring: 622 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 37: RACT Applicability for Major Facilities**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.10(e)**

**Item 37.1:**

All process sources applicable to 6 NYCRR Part 212.10 after May 31, 1995 will remain subject to all provisions of that section even if the facility's annual potential to emit of nitrogen oxides or volatile organic emissions falls below the applicability thresholds.

**Condition 38: Sampling and Monitoring**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.11(a)**

**Item 38.1:**

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

**Condition 39: Open Fires Prohibited at Industrial and Commercial Sites**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 215.**

**Item 39.1:**

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

**Condition 40: Once in, always in**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.1(g)**

**Item 40.1:**

Any coating line subject to the provisions of this Part, will remain subject to these provisions even if the facility annual potential to emit VOC later falls below applicability criteria.

**Condition 41: Handling, storage, and disposal of volatile organic compounds**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

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**Applicable Federal Requirement: 6NYCRR 228.10**

**Item 41.1:**

No owner or operator of a facility subject to 6NYCRR Part 228 shall:

- (a) use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup, or coating removal;
- (b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup, or coating removal;
- (c) use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere;
- (d) 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; or
- (e) use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

**Condition 42: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 231-2.6**

**Item 42.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**Item 42.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility has established 170.1 tpy of VOC emission reduction credits by overcontrolling sources in Emission Unit U-FOAMS.

This credit requires the facility to maintain the control efficiencies as stated in this permit:

Process CAS: 85% reduction

Process R01: 90% reduction

Process R02: 90% reduction

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)



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**Condition 43: Recycling and Emissions Reduction**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 40CFR 82, Subpart F**

**Item 43.1:**

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVAC's in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR Part 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR Part 82.161.
- d. Persons disposing of small appliances, MVAC's, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR Part 82.166. ("MVAC-like appliance as defined at 40 CFR Part 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR Part 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR Part 82.166.

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

**Condition 44: Emission Point Definition By Emission Unit**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 44.1:**

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

Emission Unit: U-DENSI

Emission Point: DEN01

Height (ft.): 23

Diameter (in.): 18

NYTMN (km.): 4752.621 NYTME (km.): 312.229 Building: 2

**Item 44.2:**

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

|                 |          |                 |                   |
|-----------------|----------|-----------------|-------------------|
| Emission Unit:  | U-FOAMS  |                 |                   |
| Emission Point: | CE100    |                 |                   |
| Height (ft.):   | 27       | Diameter (in.): | 36                |
|                 |          |                 | Building: 1       |
| Emission Point: | CFE10    |                 |                   |
| Height (ft.):   | 26       | Diameter (in.): | 12                |
|                 |          |                 | Building: 1       |
| Emission Point: | CST01    |                 |                   |
| Height (ft.):   | 12       | Diameter (in.): | 2                 |
|                 |          |                 | Building: UND     |
| Emission Point: | CST02    |                 |                   |
| Height (ft.):   | 12       | Diameter (in.): | 2                 |
|                 |          |                 | Building: UND     |
| Emission Point: | CST03    |                 |                   |
| Height (ft.):   | 12       | Diameter (in.): | 2                 |
|                 |          |                 | Building: UND     |
| Emission Point: | CST04    |                 |                   |
| Height (ft.):   | 12       | Diameter (in.): | 2                 |
|                 |          |                 | Building: UND     |
| Emission Point: | CT001    |                 |                   |
| Height (ft.):   | 40       | Diameter (in.): | 28                |
|                 |          |                 | Building: OUTSIDE |
| Emission Point: | CT002    |                 |                   |
| Height (ft.):   | 40       | Diameter (in.): | 40                |
|                 |          |                 | Building: CARB    |
| Emission Point: | CT003    |                 |                   |
| Height (ft.):   | 41       | Diameter (in.): | 12                |
| NYTMN (km.):    | 4752.621 | NYTME (km.):    | 312.229           |
|                 |          |                 | Building: ROOF    |
| Emission Point: | UP100    |                 |                   |
| Height (ft.):   | 24       | Diameter (in.): | 23                |
| NYTMN (km.):    | 4752.621 | NYTME (km.):    | 312.229           |
|                 |          |                 | Building: 6       |
| Emission Point: | VP100    |                 |                   |
| Height (ft.):   | 28       | Diameter (in.): | 10                |
|                 |          |                 | Building: 6       |

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**Item 44.3:**

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

Emission Unit: U-OPSEX

Emission Point: OPS03

Height (ft.): 36

Diameter (in.): 16

Building: 4

Emission Point: OPS12

Height (ft.): 36

Length (in.): 20

Width (in.): 20

Building: 4

**Item 44.4:**

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

Emission Unit: U-PYROL

Emission Point: BERRI

Height (ft.): 12

Diameter (in.): 4

NYTMN (km.): 4752.621 NYTME (km.): 312.229 Building: 2

**Item 44.5:**

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

Emission Unit: U-SOLID

Emission Point: CD-53

Height (ft.): 28

Diameter (in.): 13

NYTMN (km.): 4752.621 NYTME (km.): 312.229 Building: 1

Emission Point: CD-54

Height (ft.): 28

Diameter (in.): 13

Building: 1

Emission Point: CRT01

Height (ft.): 5

Diameter (in.): 8

NYTMN (km.): 4752.621 NYTME (km.): 312.229 Building: OUTSIDE

Emission Point: CRT02

Height (ft.): 1

Diameter (in.): 15

NYTMN (km.): 4752.621 NYTME (km.): 312.229 Building: BH

Emission Point: CS100

Height (ft.): 40

Diameter (in.): 20

NYTMN (km.): 4752.621 NYTME (km.): 312.229 Building: SILO



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Emission Point: OPS05  
Height (ft.): 11                      Diameter (in.): 16  
Building: 4

Emission Point: OPS09  
Height (ft.): 26                      Diameter (in.): 5  
Building: 4

**Item 44.6:**

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

Emission Unit: U-SURFA

Emission Point: OPS14  
Height (ft.): 37                      Diameter (in.): 12  
Building: 1

Emission Point: OPS15  
Height (ft.): 37                      Diameter (in.): 12  
Building: 1

Emission Point: OPS16  
Height (ft.): 37                      Diameter (in.): 12  
Building: 1

Emission Point: OPSXX  
Height (ft.): 37                      Diameter (in.): 12  
Building: 1

**Condition 45: Process Definition By Emission Unit**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 201-6.**

**Item 45.1:**

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

Emission Unit: U-DENSI  
Process: DEN                              Source Classification Code: 3-08-999-99  
Process Description:  
THIS SOURCE IS ONE THERMAL DENSIFIER USED  
TO COLLAPSE POLYSTYRENE PRODUCTS. THE  
PRIMARY EMISSIONS FROM THIS PROCESS ARE VOC  
AND HAP.

Emission Source/Control: DEN01 - Process

**Item 45.2:**

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**Facility DEC ID: 8322400108**



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

Emission Unit: U-FOAMS

Process: CAS

Source Classification Code: 3-08-010-05

Process Description:

THIS PROCESS INCLUDES ALL OPERATIONS VENTED THROUGH THE CARBON ADSORPTION SYSTEM. THIS INCLUDES THE FOAM THERMOFORMER CHOPPERS, RECLAIM GRINDERS AND RECLAIM EXTRUDER FEED LINES.

Emission Source/Control: CT002 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CD-51 - Process

Emission Source/Control: CD-56 - Process

Emission Source/Control: RG100 - Process

Emission Source/Control: TC100 - Process

**Item 45.3:**

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

Emission Unit: U-FOAMS

Process: EX1

Source Classification Code: 3-08-010-02

Process Description: THIS PROCESS INCLUDES THE FOAMS EXTRUDERS.

Emission Source/Control: EX100 - Process20

**Item 45.4:**

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

Emission Unit: U-FOAMS

Process: R01

Source Classification Code: 3-08-010-05

Process Description:

THIS PROCESS INCLUDES ALL OPERATIONS CONTROLLED VIA THE RETHERM OXIDIZER. THESE OPERATIONS INCLUDE THREE RECLAIM EXTRUDERS (LINES 151, 152, AND 153).

Emission Source/Control: CT001 - Control

Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: RE100 - Process

**Item 45.5:**

**New York State Department of Environmental Conservation**

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**Facility DEC ID: 8322400108**



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

Emission Unit: U-FOAMS

Process: R02

Source Classification Code: 3-08-010-05

Process Description:

THIS PROCESS INCLUDES THE RETOX  
INCINERATOR AND ALL OPERATIONS VENTED  
THROUGH IT. THIS INCLUDES THE LINE 154  
RECLAIM EXTRUDER.

Emission Source/Control: CT003 - Control

Control Type: DIRECT FLAME AFTERBURNER

Emission Source/Control: RE154 - Process

**Item 45.6:**

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

Emission Unit: U-FOAMS

Process: RST

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE FOAMS ROLL  
STORAGE OPERATIONS.

Emission Source/Control: RSB05 - Process

Emission Source/Control: RSB07 - Process

**Item 45.7:**

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

Emission Unit: U-FOAMS

Process: T01

Source Classification Code: 4-07-016-07

Process Description:

THIS PROCESS INCLUDES ONE OF THE  
ISOPENTANE UNDERGROUND STORAGE TANKS.

Emission Source/Control: TANK1 - Process

**Item 45.8:**

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

Emission Unit: U-FOAMS

Process: T02

Source Classification Code: 4-07-016-07

Process Description:

THIS PROCESS INCLUDES ONE OF THE  
ISOPENTANE UNDERGROUND STORAGE TANKS.

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**Facility DEC ID: 8322400108**



Emission Source/Control: TANK2 - Process

**Item 45.9:**

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

Emission Unit: U-FOAMS

Process: T03

Source Classification Code: 4-07-016-07

Process Description:

THIS PROCESS INCLUDES ONE OF THE  
ISOPENTANE UNDERGROUND STORAGE TANKS.

Emission Source/Control: TANK3 - Process

**Item 45.10:**

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

Emission Unit: U-FOAMS

Process: T04

Source Classification Code: 4-07-016-07

Process Description:

THIS PROCESS INCLUDES ONE OF THE  
ISOPENTANE UNDERGROUND STORAGE TANKS.

Emission Source/Control: TANK4 - Process

**Item 45.11:**

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

Emission Unit: U-FOAMS

Process: THE

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE FOAMS  
THERMOFORMING OPERATIONS AND ASSOCIATED  
VACUUM PUMPS.

Emission Source/Control: TF100 - Process

Emission Source/Control: VP100 - Process

**Item 45.12:**

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

Emission Unit: U-FOAMS

Process: UWP

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE FOUR UNDERWATER  
PELLETIZERS.

Emission Source/Control: UP100 - Process

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**Facility DEC ID: 8322400108**



**Item 45.13:**

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

Emission Unit: U-OPSEX

Process: OPS

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE TWO OPS  
EXTRUSION LINE OVENS AT THE FACILITY. THE  
PRIMARY EMISSIONS ARE VOC AND HAP.

Emission Source/Control: OPS03 - Process

Emission Source/Control: OPS12 - Process

**Item 45.14:**

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

Emission Unit: U-PYROL

Process: PYR

Source Classification Code: 3-08-999-99

Process Description:

THIS SOURCE IS ONE BERRINGER JET CLEANER  
USED TO MELT RESIDUAL PLASTIC LEFT IN THE  
EXTRUDER DYES. THERE ARE MINOR EMISSIONS  
OF VOC, PARTICULATE MATTER AND HAP.

Emission Source/Control: BERRI - Process

**Item 45.15:**

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

Emission Unit: U-SILIC

Process: SIL

Source Classification Code: 4-02-022-01

Process Description:

THIS PROCESS INCLUDES THE TWO SILICONE  
COATING OPERATIONS FOR THE OPS EXTRUSION  
LINES. MINOR AMOUNTS OF VOC ARE EMITTED  
FROM THESE FUGITIVE SOURCES.

Emission Source/Control: 401SI - Process

Emission Source/Control: 402SI - Process

**Item 45.16:**

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

Emission Unit: U-SOLID

Process: CR1

Source Classification Code: 3-08-999-99

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**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**



Process Description:

THIS PROCESS INCLUDES THE OPS UNLOAD SYSTEM AND ASSOCIATED FABRIC FILTER CONTROL. THE EMISSIONS FROM THIS SOURCE ARE PARTICULATE MATTER.

Emission Source/Control: CRT01 - Process

**Item 45.17:**

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

Emission Unit: U-SOLID

Process: CR2

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE RAILCAR UNLOADING OPERATION AND ASSOCIATED FABRIC FILTER CONTROL. THE EMISSIONS OF CONCERN ARE PARTICULATE MATTER.

Emission Source/Control: CRT02 - Process

**Item 45.18:**

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

Emission Unit: U-SOLID

Process: CS1

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE POLYSTYRENE TRANSFER SYSTEM. THE EMISSIONS OF CONCERN ARE PARTICULATE MATTER.

Emission Source/Control: CS100 - Process

**Item 45.19:**

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

Emission Unit: U-SOLID

Process: M05

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE EXTRUSION SCRAP COLLECTION SYSTEM AND ASSOCIATED FABRIC FILTER CONTROL. THE EMISSIONS OF CONCERN ARE PARTICULATE MATTER.

Emission Source/Control: OPS05 - Process

**Item 45.20:**

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

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**Facility DEC ID: 8322400108**



Emission Unit: U-SOLID

Process: M09

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE EXTRUDER AND RECLAIM HOPPER SYSTEM AND ASSOCIATED CONTROLS. THE EMISSIONS OF CONCERN ARE PARTICULATE MATTER.

Emission Source/Control: 09C01 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 09C02 - Control

Control Type: FABRIC FILTER

Emission Source/Control: CD-53 - Process

Emission Source/Control: CD-54 - Process

**Item 45.21:**

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

Emission Unit: U-SOLID

Process: M53

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE RECLAIM EXTRUDER LINE 153 FEED BIN AND ASSOCIATED FABRIC FILTER CONTROL. THE EMISSIONS OF CONCERN ARE PARTICULATE MATTER. THIS PROCESS COVERS OPS RECLAIM TRANSFER.

Emission Source/Control: CD-53 - Process

**Item 45.22:**

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

Emission Unit: U-SOLID

Process: M54

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE FEED FOR THE LINE 154 RECLAIM EXTRUDER AND ASSOCIATED FABRIC FILTER CONTROL. THE ONLY POLLUTANT EMITTED IS PARTICULATE MATTER. THE PROCESS COVERS THE TRANSFER OF OPS RECLAIM.

Emission Source/Control: CD-54 - Process

**Item 45.23:**

**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**



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

Emission Unit: U-SURFA

Process: ATM

Source Classification Code: 4-02-999-96

Process Description:

THIS PROCESS INCLUDES THE APPLICATION OF ATMER ANTI FOG COATING TO THE PLASTIC PRODUCT. MINOR AMOUNTS OF VOC ARE EMITTED IN THE PROCESS. FOUR OF THE THERMOFORMERS WILL HAVE THE CAPABILITY TO PERFORM THIS OPERATION.

Emission Source/Control: OPS14 - Process

Emission Source/Control: OPS15 - Process

Emission Source/Control: OPS16 - Process

Emission Source/Control: OPSXX - Process

**Condition 46: Emissions from new emission sources and/or modifications Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Item 46.1:**

This Condition applies to Emission Unit: U-DENSI

Process: DEN

**Item 46.2:**

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.

**Condition 47: Emissions from new emission sources and/or modifications Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Item 47.1:**

This Condition applies to Emission Unit: U-FOAMS

Process: CAS

**Item 47.2:**

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.



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**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

**Condition 48: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 48.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: CAS

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

**Item 48.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PARTICULATES

Upper Limit of Monitoring: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 49: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: CAS

**Item 49.2:**



**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will 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.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 50: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.11(b)(3)**

**Item 50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: CAS

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**Item 50.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

FACILITY WILL CONTINUOUSLY MONITOR AND RECORD THE VOLATILE ORGANIC COMPOUND OUTLET CONCENTRATIONS. THE FACILITY WILL OPERATE THIS CEMS ACCORDING TO THE DECEMBER 5, 1995 QUALITY ASSURANCE PLAN (FROM TENNECO PACKAGING).



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**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

Lower Limit of Monitoring: 94 percent reduction by weight  
Reference Test Method: PER QA DOCUMENT  
Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION  
Averaging Method: CALENDAR YEAR AVERAGE  
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 51: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)**

**Item 51.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS  
Process: EX1

Regulated Contaminant:  
CAS No: 0NY998-00-0  
Name: VOC

**Item 51.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:  
A RACT ANALYSIS DETAILING THE  
INFEASIBILITY OF FURTHER CONTROLLING  
EMISSIONS FOR THIS PROCESS HAS BEEN  
APPROVED BY THE DEPARTMENT. THEREFORE,  
AN ALTERNATIVE EMISSION LIMIT HAS BEEN  
ESTABLISHED FOR THIS PROCESS. THIS LIMIT  
IS PART OF THE SIP.

Work Practice Type: PROCESS MATERIAL THRUPUT  
Process Material: VOC's  
Upper Limit of Monitoring: 39.3 pounds per hour  
Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)  
Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 52: Emissions from new emission sources and/or modifications**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**New York State Department of Environmental Conservation**

Permit ID: 8-3224-00108/00116

Facility DEC ID: 8322400108



**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Item 52.1:**

This Condition applies to Emission Unit: U-FOAMS  
Process: R01

**Item 52.2:**

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.

**Condition 53: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 53.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS  
Process: R01

Regulated Contaminant:  
CAS No: 0NY075-00-0  
Name: PARTICULATES

**Item 53.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PARTICULATES

Upper Limit of Monitoring: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

**Condition 54: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 54.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: R01

**Item 54.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will 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.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 55: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)**

**Item 55.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: R01

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**



**Item 55.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

AN ACCEPTABLE STACK TEST WILL BE  
COMPLETED WITHIN 180 DAYS OF THE ISSUE  
DATE OF THIS PERMIT.

Lower Limit of Monitoring: 90 percent reduction by weight

Reference Test Method: Method 25

Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 56: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

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

**Item 56.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: R01

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**Item 56.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

FACILITY WILL CONTINUOUSLY MONITOR AND  
RECORD THE EXHAUST GAS TEMPERATURE FROM  
THERMAL OR CATALYTIC INCINERATORS. THE  
MONITORS WILL BE PERIODICALLY CALIBRATED  
AND OPERATED AT ALL TIMES THAT THE  
ASSOCIATED CONTROL EQUIPMENT IS  
OPERATING.

Parameter Monitored: TEMPERATURE

Lower Limit of Monitoring: 1325 degrees Fahrenheit



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**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 57: Emissions from new emission sources and/or modifications  
Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Item 57.1:**

This Condition applies to Emission Unit: U-FOAMS  
Process: R02

**Item 57.2:**

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.

**Condition 58: Compliance Certification  
Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 58.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS  
Process: R02

Regulated Contaminant:  
CAS No: 0NY075-00-0  
Name: PARTICULATES

**Item 58.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PARTICULATES



**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

Upper Limit of Monitoring: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING

**DESCRIPTION**

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 59: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 59.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: R02

**Item 59.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will 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.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING

**DESCRIPTION**

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 60: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)**

**Item 60.1:**

The Compliance Certification activity will be performed for:

**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**



Emission Unit: U-FOAMS

Process: R02

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**Item 60.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

AN ACCEPTABLE STACK TEST WILL BE  
COMPLETED WITHIN 180 DAYS OF THE ISSUE  
DATE OF THIS PERMIT.

Lower Limit of Monitoring: 95 percent reduction by weight

Reference Test Method: Method 25

Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 61: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

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

**Item 61.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: R02

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**Item 61.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

FACILITY WILL CONTINUOUSLY MONITOR AND  
RECORD THE EXHAUST GAS TEMPERATURE FROM

**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**



THERMAL OR CATALYTIC INCINERATORS. THE MONITORS WILL BE PERIODICALLY CALIBRATED AND OPERATED AT ALL TIMES THAT THE ASSOCIATED CONTROL EQUIPMENT IS OPERATING.

Parameter Monitored: TEMPERATURE

Lower Limit of Monitoring: 1600 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 09/26/2001 for the period 02/28/2001 through 08/27/2001

**Condition 62: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)**

**Item 62.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: RST

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**Item 62.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

A RACT ANALYSIS DETAILING THE INFEASIBILITY OF FURTHER CONTROLLING EMISSIONS FOR THIS PROCESS HAS BEEN APPROVED BY THE DEPARTMENT. THEREFORE, AN ALTERNATIVE EMISSION LIMIT HAS BEEN ESTABLISHED FOR THIS PROCESS. THIS LIMIT IS PART OF THE SIP.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: VOC's

Upper Limit of Monitoring: 39.3 pounds per hour

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION



**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 63: VOL storage tanks from 10000 - 20000 gallons**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(iv)**

**Item 63.1:**

This Condition applies to Emission Unit: U-FOAMS  
Process: T01

**Item 63.2:**

Volatile organic liquid tanks with a capacity greater than or equal to 10,000 gallons but less than 20,000 gallons must be equipped with submerged fill.

**Condition 64: VOL storage tanks from 10000 - 20000 gallons**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(iv)**

**Item 64.1:**

This Condition applies to Emission Unit: U-FOAMS  
Process: T02

**Item 64.2:**

Volatile organic liquid tanks with a capacity greater than or equal to 10,000 gallons but less than 20,000 gallons must be equipped with submerged fill.

**Condition 65: VOL storage tanks from 10000 - 20000 gallons**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(iv)**

**Item 65.1:**

This Condition applies to Emission Unit: U-FOAMS  
Process: T03

**Item 65.2:**

Volatile organic liquid tanks with a capacity greater than or equal to 10,000 gallons but less than 20,000 gallons must be equipped with submerged fill.

**Condition 66: VOL storage tanks from 10000 - 20000 gallons**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 229.3(e)(2)(iv)**

**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**



**Item 66.1:**

This Condition applies to0 Emission Unit: U-FOAMS  
Process: T04

**Item 66.2:**

Volatile organic liquid tanks with a capacity greater than or equal to 10,000 gallons but less than 20,000 gallons must be equipped with submerged fill.

**Condition 67: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(iii)**

**Item 67.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS  
Process: THE

Regulated Contaminant:  
CAS No: 0NY998-00-0  
Name: VOC

**Item 67.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

A RACT ANALYSIS DETAILING THE INFEASIBILITY OF FURTHER CONTROLLING EMISSIONS FOR THIS PROCESS HAS BEEN APPROVED BY THE DEPARTMENT. THEREFORE, AN ALTERNATIVE EMISSION LIMIT HAS BEEN ESTABLISHED FOR THIS PROCESS. THIS LIMIT IS PART OF THE SIP.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: VOC's

Upper Limit of Monitoring: 39.3 pounds per hour

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)



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Permit ID: 8-3224-00108/00116

Facility DEC ID: 8322400108

**Condition 68: Compliance Certification**

Effective between the dates of 02/28/2001 and 02/28/2006

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 68.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: UWP

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

**Item 68.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PARTICULATES

Upper Limit of Monitoring: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING  
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 69: Compliance Certification**

Effective between the dates of 02/28/2001 and 02/28/2006

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 69.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: UWP

**Item 69.2:**



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**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will 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.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 70: Emissions from new emission sources and/or modifications Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Item 70.1:**

This Condition applies to Emission Unit: U-OPSEX  
Process: OPS

**Item 70.2:**

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.

**Condition 71: Emissions from new emission sources and/or modifications Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Item 71.1:**

This Condition applies to Emission Unit: U-PYROL  
Process: PYR

**Item 71.2:**

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.

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Facility DEC ID: 8322400108



**Condition 72: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 72.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PYROL

Process: PYR

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

**Item 72.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PARTICULATES

Upper Limit of Monitoring: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 73: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 73.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PYROL

Process: PYR

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**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**



**Item 73.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will 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.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 74: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 74.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SILIC

Process: SIL

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

**Item 74.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.



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**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

Parameter Monitored: PARTICULATES

Upper Limit of Monitoring: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING

**DESCRIPTION**

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 75: volatile organic compound emission control requirements  
Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.3(a)**

**Item 75.1:**

This Condition applies to Emission Unit: U-SILIC

Process: SIL

**Item 75.2:**

No person shall cause or allow the usage of coatings that exceed the allowable pounds of volatile organic compounds per gallon, minus water and excluded VOC at application, as specified in table 1 and table 2 of Part 228, unless an approved coating system or approved control equipment is utilized or a variance has been granted.

**Condition 76: Compliance Certification  
Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.4**

**Item 76.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SILIC

Process: SIL

**Item 76.2:**

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 to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to 6NYCRR Part 228.

The Department reserves the right to perform or require



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the performance of a Method 9 opacity evaluation

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING

**DESCRIPTION**

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 77: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.5(a)**

**Item 77.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SILIC

Process: SIL

**Item 77.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the department. Records must be maintained at the facility for a period of five years.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 78: method 24 40 CFR 60**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.5(b)**

**Item 78.1:**

This Condition applies to Emission Unit: U-SILIC

Process: SIL

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Permit ID: 8-3224-00108/00116

Facility DEC ID: 8322400108



**Item 78.2:**

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings are presented in appendix A, method 24, of 40 CFR 60.

**Condition 79: Alternative Analytical Methods**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.5(c)**

**Item 79.1:**

This Condition applies to Emission Unit: U-SILIC  
Process: SIL

**Item 79.2:**

Where the methods referenced in 6 NYCRR Part 228.5(b) are not applicable, alternate analytical methods for surface coating may be acceptable, subject to the approval of the commissioner.

**Condition 80: samples**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.5(d)**

**Item 80.1:**

This Condition applies to Emission Unit: U-SILIC  
Process: SIL

**Item 80.2:**

Representatives of the department shall be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance.

**Condition 81: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.7**

**Item 81.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SILIC  
Process: SIL

Regulated Contaminant:  
CAS No: 0NY998-00-0  
Name: VOC

**Item 81.2:**

Compliance Certification shall include the following monitoring:

**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**



Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings used for the surface coating of paper and other web materials may contain a maximum of 2.9 pounds of volatile organic compounds per gallon of coating (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Limit of Monitoring: 2.9 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 82: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 82.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SOLID

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

**Item 82.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PARTICULATES

Upper Limit of Monitoring: 0.050 grains per dscf



**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 83: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 83.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SOLID

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

**Item 83.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

AN OPERATION AND MAINTENANCE MANUAL  
DETAILING PROCEDURES FOR ALL THE EMISSION  
UNIT U-SOLID PROCESSES, EMISSION SOURCES,  
AND CONTROL DEVICES WILL BE SUBMITTED TO  
THE DEPARTMENT WITHIN 30 DAYS OF THE  
ISSUE DATE OF THIS PERMIT. THIS MANUAL  
WILL BE IN A FORMAT ACCEPTABLE TO THE  
DEPARTMENT. THE FACILITY IS REQUIRED TO  
FOLLOW THE PROCEDURES IN THIS DOCUMENT  
AND ANY DEVIATIONS WILL BE CONSIDERED A  
VIOLATION OF THE TITLE V OPERATING PERMIT  
AND WILL BE REPORTED TO THE DEPARTMENT AS  
SUCH.

Monitoring Frequency: AS REQUIRED - SEE MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 84: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**New York State Department of Environmental Conservation**

Permit ID: 8-3224-00108/00116

Facility DEC ID: 8322400108



**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 84.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SOLID

**Item 84.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will 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.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 85: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 85.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SURFA

Process: ATM

Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

**Item 85.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING



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**Facility DEC ID: 8322400108**

**Monitoring Description:**

In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PARTICULATES

Upper Limit of Monitoring: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING

**DESCRIPTION**

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

**METHOD INDICATED**

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 86: volatile organic compound emission control requirements  
Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.3(a)**

**Item 86.1:**

This Condition applies to Emission Unit: U-SURFA  
Process: ATM

**Item 86.2:**

No person shall cause or allow the usage of coatings that exceed the allowable pounds of volatile organic compounds per gallon, minus water and excluded VOC at application, as specified in table 1 and table 2 of Part 228, unless an approved coating system or approved control equipment is utilized or a variance has been granted.

**Condition 87: Compliance Certification  
Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.4**

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**Item 87.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SURFA

Process: ATM

**Item 87.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL



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**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**

**DEVICE PARAMETERS AS SURROGATE**

**Monitoring Description:**

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to 6NYCRR Part 228.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

**Condition 88: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.5(a)**

**Item 88.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SURFA

Process: ATM

**Item 88.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

**Monitoring Description:**

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the department. Records must be maintained at the facility for a period of five years.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)



**New York State Department of Environmental Conservation**

Permit ID: 8-3224-00108/00116

Facility DEC ID: 8322400108

**Condition 89: method 24 40 CFR 60**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.5(b)**

**Item 89.1:**

This Condition applies to Emission Unit: U-SURFA  
Process: ATM

**Item 89.2:**

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings are presented in appendix A, method 24, of 40 CFR 60.

**Condition 90: Alternative Analytical Methods**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.5(c)**

**Item 90.1:**

This Condition applies to Emission Unit: U-SURFA  
Process: ATM

**Item 90.2:**

Where the methods referenced in 6 NYCRR Part 228.5(b) are not applicable, alternate analytical methods for surface coating may be acceptable, subject to the approval of the commissioner.

**Condition 91: samples**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.5(d)**

**Item 91.1:**

This Condition applies to Emission Unit: U-SURFA  
Process: ATM

**Item 91.2:**

Representatives of the department shall be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance.

**Condition 92: Compliance Certification**  
**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable Federal Requirement: 6NYCRR 228.7**

**Item 92.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-SURFA

**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**



Process: ATM

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**Item 92.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings used for the surface coating of paper and other web materials may contain a maximum of 2.9 pounds of volatile organic compounds per gallon of coating (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Limit of Monitoring: 2.9 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)



**STATE ONLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**Condition 93: General Provisionsr Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable State Requirement: 6NYCRR 201-5.**

**Item 93.1:**

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

**Item 93.2:**

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

**Item 93.3:**

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

**Condition 94: Contaminant List**

**Effective between the dates of 02/28/2001 and 02/28/2006**

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

**Item 94.1:**

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

CAS No: 0NY075-00-0  
Name: PARTICULATES

**Condition 95: Air pollution prohibited**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**New York State Department of Environmental Conservation**

**Permit ID: 8-3224-00108/00116**

**Facility DEC ID: 8322400108**



**Applicable State Requirement: 6NYCRR 211.2**

**Item 95.1:**

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 96: Compliance Certification**

**Effective between the dates of 02/28/2001 and 02/28/2006**

**Applicable State Requirement: 6NYCRR 231-1.2(a)(3)**

**Item 96.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant:

CAS No: 0NY998-00-0

Name: VOC

**Item 96.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

TO ENSURE THAT NO SINGLE PROPOSED SOURCE PROJECT EXCEEDS THE PART 231 APPLICABILITY LEVEL OF 40 TONS PER YEAR OF VOC, EXTRUDER LINES 108, 116, AND 117 WILL BE CAPPED TO 5562 TONS PER YEAR OF POLYSTYRENE EACH (1270 POUNDS PER HOUR). RECORDS OF TOTAL THROUGHPUT WILL BE KEPT IN A FORMAT ACCEPTABLE TO THE DEPARTMENT.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: VOC's

Parameter Monitored: PLASTIC

Upper Limit of Monitoring: 5562 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)