



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 8-3224-00108/00116
Effective Date:

Expiration Date:

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

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

Contact: MARC DEROLLER
PACTIV CORP
5250 NORTH ST
CANANDAIGUA, NY 14424
(585) 393-3346

Description:

Modification and renewal of the Title V Facility Permit for the Canandaigua Packaging Plant at Pactiv's Canandaigua facility. The Packaging Plant produces polystyrene foam, and includes emission points for foam extrusion lines, extrusion line ovens, a pyrolysis oven for extruder die cleaning, a thermal densifier to collapse foam, silicone and plastic coating operations, and material and scrap handling systems. The Plant is subject to Title V due to VOC emissions in excess of 50 tons per year.

A separate Title V Permit covers research and development operations at the Technology Center at Pactiv's Canandaigua facility.

This Permit maintains the Part 212 VOC RACT variance granted by the Department previously, allowing operation of foam extruders, thermoforming operations, and foam roll storage without emission controls. The variance is based on low concentrations of slowly released VOC, resulting in costs for emission control in significantly in excess of the Department's guideline level per ton of emissions controlled. Carbon absorption and thermal oxidizer control equipment continues to be used for scrap material reclamation processes which release VOC foam expanding agent more rapidly.

This Permit also continues the restriction of material throughput to 4 existing foam extrusion lines, to restrict potential VOC emission levels from each line's processes, including scrap reclamation, to below the 40 ton per year threshold of 6 NYCRR Part 231 New Source Review in Ozone Transport Regions.

Finally, this Permit authorizes operation of a new foam extrusion line emission unit for plastic cup production. This emission unit also includes solid and scrap material handling operations, cup surface preparation with corona treaters, and offset lithographic and ink jet printing and cleaning operations. Restrictions on material



throughput limit potential VOC emissions from this new line's processes to below the 40 ton per year Part 231 threshold.

Facility-wide total VOC emissions from all sources, including those capped below Part 231 thresholds, are limited to 651 tons per year.

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

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

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



CONDITIONS **PAGE LOCATION OF**

<u>PAGE</u>	
	DEC GENERAL CONDITIONS
	General Provisions
5	1 Facility Inspection by the Department
5	2 Relationship of this Permit to Other Department Orders and Determinations
5	3 Applications for permit renewals, modifications and transfers
6	4 Permit modifications, suspensions or revocations by the Department
	Facility Level
6	5 Submission of application for permit modification or renewal-REGION
8	
	HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.6(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**



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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

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

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

Permit Effective Date:

Permit Expiration Date:



PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

8	1	6NYCRR 200.6: Acceptable Ambient Air Quality
9	3	6NYCRR 201-6.5(a)(7): Fees
9	4	6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
9	5	6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
10	6	6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
12	2	6NYCRR 201-6.5(e): Compliance Certification
13	7	6NYCRR 202-2.1: Compliance Certification
14	8	6NYCRR 202-2.5: Recordkeeping requirements
14	9	6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
14	10	6NYCRR 200.7: Maintenance of Equipment
15	11	6NYCRR 201-1.7: Recycling and Salvage
15	12	6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
15	13	6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
15	14	6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
16	15	6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
16	16	6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
16	17	6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
17	18	6NYCRR 201-6.5(f)(6): Off Permit Changes
17	19	6NYCRR 202-1.1: Required Emissions Tests
17	20	6NYCRR 211.3: Visible Emissions Limited
18	21	40CFR 68: Accidental release provisions.
18	22	40CFR 82, Subpart F: Recycling and Emissions Reduction
19	23	6NYCRR 201-6: Emission Unit Definition
20	24	6NYCRR 201-6.5(f)(6): Compliance Certification
21	25	6NYCRR 201-6.5(g): Compliance Certification
22	26	6NYCRR 201-6.5(g): Compliance Certification
23	27	6NYCRR 201-7.2: Facility Permissible Emissions
23	*28	6NYCRR 201-7.2: Capping Monitoring Condition
24	*29	6NYCRR 201-7.2: Capping Monitoring Condition
25	30	6NYCRR 212.4(c): Compliance Certification
27	31	6NYCRR 212.6(a): Compliance Certification
28	32	6NYCRR 212.10(c)(4)(iii): Compliance Certification
29	33	6NYCRR 212.10(e): RACT Applicability for Major Facilities
29	34	6NYCRR 212.11(a): Sampling and Monitoring
29	35	6NYCRR 228.1(d): Will remain subject
29	36	6NYCRR 228.6: Prohibition of sale
30	37	6NYCRR 228.10: Compliance Certification
31	38	6NYCRR 231-2.6: Compliance Certification
		Emission Unit Level
32	39	6NYCRR 201-6: Emission Point Definition By Emission Unit
37	40	6NYCRR 201-6: Process Definition By Emission Unit
44	41	6NYCRR 201-7.2: Process Permissible Emissions



- 45 EU=U-FOAMS,Proc=CAS
42 6NYCRR 212.11(b)(3): Compliance Certification
- 45 EU=U-FOAMS,Proc=EX1
43 6NYCRR 212.10(c)(4)(iii): Compliance Certification
- 46 EU=U-FOAMS,Proc=R03,ES=CT004
44 6NYCRR 212.10(c)(4)(i): Compliance Certification
47 45 6NYCRR 212.10(c)(4)(i): Compliance Certification
- 47 EU=U-FOAMS,Proc=RST
46 6NYCRR 212.10(c)(4)(iii): Compliance Certification
- 48 EU=U-FOAMS,Proc=T01
47 6NYCRR 229.3(e)(2)(iv): VOL storage tanks from 10000 - 20000 gallons
- 48 EU=U-FOAMS,Proc=TF1
48 6NYCRR 212.10(c)(4)(iii): Compliance Certification
- 49 EU=U-PPCUP,Proc=PRT
49 6NYCRR 234.3(b)(2): Compliance Certification
49 50 6NYCRR 234.3(e): Compliance Certification
51 51 6NYCRR 234.4(b)(3): Compliance Certification
51 52 6NYCRR 234.5(a): prohibition of sale or specification
52 53 6NYCRR 234.5(b): VOC content
52 54 6NYCRR 234.6: Compliance Certification
- 53 EU=U-PPCUP,Proc=SLC
53 55 6NYCRR 228.3(a): Recordkeeping, Reports of VOCs - EU Level
53 56 6NYCRR 228.4: Compliance Certification
54 57 6NYCRR 228.5(a): Compliance Certification
55 58 6NYCRR 228.5(b): Use of Methods 311 or 24.
55 59 6NYCRR 228.5(c): Compliance Certification
56 60 6NYCRR 228.5(d): Department access to obtain samples.
56 61 6NYCRR 228.7: Compliance Certification
- 57 EU=U-SILIC,Proc=SIL
57 62 6NYCRR 228.3(a): Recordkeeping, Reports of VOCs - EU Level
57 63 6NYCRR 228.4: Compliance Certification
58 64 6NYCRR 228.5(a): Compliance Certification
59 65 6NYCRR 228.5(b): Use of Methods 311 or 24.
59 66 6NYCRR 228.5(c): Compliance Certification
60 67 6NYCRR 228.5(d): Department access to obtain samples.
60 68 6NYCRR 228.7: Compliance Certification
- 61 EU=U-SOLID
69 6NYCRR 212.4(c): Compliance Certification
- 61 EU=U-SURFA,Proc=ATM
70 6NYCRR 228.3(a): Recordkeeping, Reports of VOCs - EU Level
61 71 6NYCRR 228.4: Compliance Certification
62 72 6NYCRR 228.5(a): Compliance Certification



- 63 73 6NYCRR 228.5(b): Use of Methods 311 or 24.
- 63 74 6NYCRR 228.5(c): Compliance Certification
- 64 75 6NYCRR 228.5(d): Department access to obtain samples.
- 64 76 6NYCRR 228.7: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 66 77 ECL 19-0301: Contaminant List
- 66 78 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 68 79 6NYCRR 211.2: Air pollution prohibited
- 68 80 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for



permit renewal purposes.

- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.
- Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)**
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit



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

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.



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

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

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

Item L: Permit Exclusion - ECL 19-0305
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

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

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



Condition 1: Acceptable Ambient Air Quality
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 200.6

Item 1.1:

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

Condition 3: Fees
Effective for entire length of Permit

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

Item 3.1:

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

Condition 4: Recordkeeping and reporting of compliance monitoring
Effective for entire length of Permit

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

Item 4.1:

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

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

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

Condition 5: Monitoring, Related Recordkeeping, and Reporting Requirements.
Effective for entire length of Permit

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



Item 5.1:

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

Condition 6: Compliance Certification
Effective for entire length of Permit

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

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

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

(2) For emissions of any regulated air pollutant, excluding those



listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

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

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

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

seeks The provisions of 6 NYCRR 201-1.4 shall apply if the permittee to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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

previous six In the case of any emission testing performed during the



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.

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 2: Compliance Certification
Effective for entire length of Permit

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

Item 2.1:
The Compliance Certification activity will be performed for the Facility.

Item 2.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.

- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission



limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

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

The address for the RAPCE is as follows:

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

The address for the BQA is as follows:

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

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2010.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.



Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

**Condition 8: Recordkeeping requirements
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 202-2.5

Item 8.1:

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

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

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

**Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 215

Item 9.1:

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

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

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



Condition 10: Maintenance of Equipment
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 201-1.7

Item 11.1:

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

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 201-1.8

Item 12.1:

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 13: Exempt Sources - Proof of Eligibility
Effective for entire length of Permit

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

Item 13.1:

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

Condition 14: Trivial Sources - Proof of Eligibility
Effective for entire length of Permit

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



Item 14.1:

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

Condition 15: Standard Requirement - Provide Information
Effective for entire length of Permit

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

Item 15.1:

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

Condition 16: General Condition - Right to Inspect
Effective for entire length of Permit

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

Item 16.1:

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

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective for entire length of Permit



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

Item 17.1:

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

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective for entire length of Permit

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

Item 18.1:

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

- (i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 202-1.1

Item 19.1:

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



measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 211.3

Item 20.1:

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

Condition 21: Accidental release provisions.
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 68

Item 21.1:

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

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

Condition 22: Recycling and Emissions Reduction
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 82, Subpart F

Item 22.1:

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



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

Condition 23: Emission Unit Definition
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:

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 23.2:

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

Emission Unit: U-FOAMS
Emission Unit Description:
This unit included polystyrene foam extrusion, storage, and thermoforming processes.

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

Item 23.3:

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

Emission Unit: U-OPSEX
Emission Unit Description:
This unit include extrusion line ovens.

Building(s): 4

Item 23.4:

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

Emission Unit: U-PPCUP
Emission Unit Description:
Clear, opaque, and soufflé cup extrusion, thermoforming, printing, and solid and scrap handling processes.

Building(s): 8-5



8-6

Item 23.5:

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

Emission Unit: U-PYROL

Emission Unit Description:

This unit includes a pyrolysis oven used for die cleaning.

Building(s): 2

Item 23.6:

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

Emission Unit: U-SILIC

Emission Unit Description:

This unit includes silicone coating lines and hot melt adhesive application operations that are fugitive sources.

Building(s): 4

Item 23.7:

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

Emission Unit: U-SOLID

Emission Unit Description:

This unit includes solid and scrap material handling operations.

Building(s): 1

4

BLOWERHOUS

OUTSIDE

SILO

Item 23.8:

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

Emission Unit: U-SURFA

Emission Unit Description:

This unit includes plastic coating operations.

Building(s): 1

8-1

Condition 24: Compliance Certification
Effective for entire length of Permit

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

Item 24.1:

The Compliance Certification activity will be performed for the Facility.

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

Operational Flexibility Plan

(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;

(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:

(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 PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 25: Compliance Certification
Effective for entire length of Permit

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

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:

Pactiv meets the 40 CFR 64.2(b)(1)(v) Compliance Assurance Monitoring (CAM) rule exemption criteria because it is a major facility whose Title V permit includes a federally enforceable emissions cap. The facility's permit contains the oxidizer and carbon adsorption system monitoring and recordkeeping practices necessary to ensure that compliance with the VOC emissions cap is met, thus satisfying the requirements that would otherwise be required by the CAM rule and included in a facility-specific CAM plan.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 26: Compliance Certification
Effective for entire length of Permit

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

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
Monitoring Description:

Non-Applicability:

This facility is not a major source of NO_x, hence, no sources at this facility are subject to 6NYCRR Part 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 R03
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.

Emissions of VOC from Unit U-PPCUP process COR are less than 3.0 pounds per hour and are not subject to VOC RACT (6NYCRR Part 212.10(c)(1))

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Facility Permissible Emissions
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 201-7.2

Item 27.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following
Potential To Emit (PTE) rate for each regulated contaminant:

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

PTE: 1,302,000 pounds per year

Condition 28: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 201-7.2

Item 28.1:

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

6NYCRR 212.10(c)(4)(iii)

Item 28.2:



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

Item 28.3:

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

Item 28.4:

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

Item 28.5:

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

Item 28.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 28.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Facility VOC emissions will be capped at 651 tons per year on a rolling 12-month basis. Records of all facility VOC emissions will be determined to prove that the annual emissions will be less than the cap of 651 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, TF1 and RST.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: VOC's

Upper Permit Limit: 651 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-month total, rolled monthly

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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



Condition 29: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 29.1:

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

6NYCRR 231-2

Item 29.2:

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

Item 29.3:

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

Item 29.4:

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

Item 29.5:

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

Item 29.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 29.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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



108,109, 116, and 117 will be capped to 5562 tons per year of polystyrene each, calculated on a rolling 12-month basis. 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 Permit Limit: 5562 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-month total, rolled monthly

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 30: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 30.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-FOAMS
Process: CAS

Emission Unit: U-SILIC
Process: SIL

Emission Unit: U-PYROL
Process: PYR

Emission Unit: U-SOLID

Emission Unit: U-SURFA

Emission Unit: U-PPCUP
Process: COR

Emission Unit: U-PPCUP
Process: MAT

Item 30.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to



perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site.

Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 31: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 31.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: U-FOAMS
Process: CAS

Emission Unit: U-FOAMS
Process: R03

Emission Unit: U-DENSI



Process: DEN

**Emission Unit: U-PPCUP
Process: MAT**

**Emission Unit: U-PYROL
Process: PYR**

Emission Unit: U-SOLID

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 32: Compliance Certification
Effective for entire length of Permit**



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

Item 32.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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 PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 33: RACT Applicability for Major Facilities
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 212.10(e)

Item 33.1:

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 34: Sampling and Monitoring
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 212.11(a)

Item 34.1:

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 35: Will remain subject
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 228.1(d)



Item 35.1:

Any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228 will remain subject to these provisions even if the annual potential to emit VOCs for the facility later falls below the thresholds set forth in 228.1(b).

Condition 36: Prohibition of sale
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.6

Item 36.1:

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

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

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

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

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

Condition 37: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.10

Item 37.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents.
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and

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

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

Monitoring Frequency: DAILY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 231-2.6

Item 38.1:
The Compliance Certification activity will be performed for the Facility.

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



Item 38.2:

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 over-controlling sources in Emission Unit U-FOAMS.

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

Process CAS: 85% destruction, which includes all downtime (preventative maintenance or malfunction)

Process R03: 90% destruction, which includes all downtime (preventative maintenance or malfunction).

The overall control efficiency of the U-FOAMS control devices will be calculated in a manner acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

**Condition 39: Emission Point Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-6

Item 39.1:

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 39.2:

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

Emission Unit: U-FOAMS

Emission Point: CST01

Height (ft.): 12

Diameter (in.): 2

Building: UST



Emission Point: CST02 Height (ft.): 12	Diameter (in.): 2	Building: UST
Emission Point: CST03 Height (ft.): 12	Diameter (in.): 2	Building: UST
Emission Point: CST04 Height (ft.): 12	Diameter (in.): 2	Building: UST
Emission Point: CT002 Height (ft.): 40	Diameter (in.): 40	Building: CARB
Emission Point: CT004 Height (ft.): Length (in.):	Width (in.):	Building: OUTSIDE
Emission Point: VP100 Height (ft.): 28 NYTMN (km.): 4752.621	Diameter (in.): 10 NYTME (km.): 312.229	Building: 2

Item 39.3:

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 39.4:

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

Emission Unit: U-PPCUP		
Emission Point: CRE01 Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: CRE02 Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: CRE03 Height (ft.): 22	Diameter (in.): 12	



			Building: 6
Emission Point: CRE04	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: CRE05	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: CRE06	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: CRE07	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: CRE08	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: CRE09	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: CRE10	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: CRE11	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE01	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE02	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE03	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE04	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE05	Height (ft.): 22	Diameter (in.): 12	



			Building: 6
Emission Point: MTE06	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE07	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE08	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE09	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE10	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE11	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE12	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE13	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE14	Height (ft.): 22	Diameter (in.): 12	Building: 6
Emission Point: MTE15	Height (ft.): 22	Diameter (in.): 12	Building: 6

Item 39.5:

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 39.6:



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:**
BLOWERHOUS

Emission Point: CS100
Height (ft.): 5 **Diameter (in.): 8**
NYTMN (km.): 4752.621 **NYTME (km.): 312.229** **Building:**
BLOWERHOUS

Emission Point: CS101
Height (ft.): 40 **Diameter (in.): 20**
NYTMN (km.): 4752.621 **NYTME (km.): 312.229** **Building: SILO**

Emission Point: CS102
Height (ft.): 40 **Diameter (in.): 20**
Building: SILO

Emission Point: CS103
Height (ft.): 40 **Diameter (in.): 20**
Building: SILO

Emission Point: CS104
Height (ft.): 40 **Diameter (in.): 20**
Building: SILO

Emission Point: CS105
Height (ft.): 40 **Diameter (in.): 20**
Building: SILO

Emission Point: CS106
Height (ft.): 40 **Diameter (in.): 20**
Building: SILO

Emission Point: CS201
Height (ft.): 40 **Diameter (in.): 20**
Building: SILO

Emission Point: CS202
Height (ft.): 40 **Diameter (in.): 20**



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

Emission Point: CS203
Height (ft.): 40 Diameter (in.): 20 Building: SILO

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

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

Item 39.7:

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
NYTMN (km.): 4752.621 NYTME (km.): 312.229 Building: 8-1

Emission Point: OPS15
Height (ft.): 37 Diameter (in.): 12
NYTMN (km.): 4752.621 NYTME (km.): 312.229 Building: 8-1

Emission Point: OPS16
Height (ft.): 37 Diameter (in.): 12
NYTMN (km.): 4752.621 NYTME (km.): 312.229 Building: 8-1

Emission Point: OPSXX
Height (ft.): 37 Diameter (in.): 12
NYTMN (km.): 4752.621 NYTME (km.): 312.229 Building: 8-1

Condition 40: Process Definition By Emission Unit
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-6

Item 40.1:

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 40.2:



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. PM associated with this process is vented to a series of dust collectors that exhaust to the carbon adsorption system.

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 40.3:

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 fugitive emissions from foam extruders in numerous buildings.

Emission Source/Control: EX100 - Process

Item 40.4:

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

Emission Unit: U-FOAMS

Process: R03

Source Classification Code: 3-08-010-05

Process Description:

This process includes all operations controlled via the Crawford RTO (CT004). These operations include four reclaim extruders (lines 151,152,153 and 154). When running OPS reclaim, this process is an exempt activity consistent with 6NYCRR Part 201-3.2(c)(36).

Emission Source/Control: CT004 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: RE100 - Process

Item 40.5:

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 40.6:

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 the blowing agent underground storage tanks.

Emission Source/Control: TANK1 - Process

Emission Source/Control: TANK2 - Process

Emission Source/Control: TANK3 - Process

Emission Source/Control: TANK4 - Process

Item 40.7:

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

Emission Unit: U-FOAMS
Process: TF1 **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 40.8:

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 PELLETTIZERS.

Emission Source/Control: UWPEL - Process

Item 40.9:

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

Emission Unit: U-OPSEX



**Emission Source/Control: MTC08 - Control
Control Type: FABRIC FILTER**

**Emission Source/Control: MTC09 - Control
Control Type: FABRIC FILTER**

**Emission Source/Control: MTC10 - Control
Control Type: FABRIC FILTER**

**Emission Source/Control: MTC11 - Control
Control Type: FABRIC FILTER**

**Emission Source/Control: MTC12 - Control
Control Type: FABRIC FILTER**

**Emission Source/Control: MTC13 - Control
Control Type: FABRIC FILTER**

**Emission Source/Control: MTC14 - Control
Control Type: FABRIC FILTER**

**Emission Source/Control: MTC15 - Control
Control Type: FABRIC FILTER**

Emission Source/Control: MTS01 - Process

Emission Source/Control: MTS02 - Process

Emission Source/Control: MTS03 - Process

Item 40.12:

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

Emission Unit: U-PPCUP

Process: PRT

Source Classification Code: 4-05-003-01

Process Description:

This process includes printing and associated equipment cleaning operations.

Emission Source/Control: PRTS1 - Process

Emission Source/Control: PRTS2 - Process

Emission Source/Control: PRTS3 - Process

Emission Source/Control: PRTS4 - Process

Emission Source/Control: PRTS5 - Process

Emission Source/Control: PRTS6 - Process

Item 40.13:



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

Emission Unit: U-PPCUP
Process: SLC **Source Classification Code:** 4-02-022-01
Process Description:
This process includes the 9 silicone operations for the PPCUP extrusion lines. Minor amounts of VOC's are emitted from these fugitive sources.

Emission Source/Control: SILC1 - Process

Item 40.14:

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 40.15:

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 and the hot melt adhesive application operations. Minor amounts of VOC are emitted from these fugitive sources.

Emission Source/Control: 401SI - Process

Emission Source/Control: 402SI - Process

Emission Source/Control: HMA01 - Process

Item 40.16:

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
Process Description:
This process includes the OPS polystyrene transfer system from railcar to unloader with associated fabric filter control. Resin is ultimately transferred from the unloader to silos that are equipped with a control device. The emissions of concern are particulate matter.

Emission Source/Control: DCCR1 - Control



Control Type: FABRIC FILTER

Emission Source/Control: CRT01 - Process

Item 40.17:

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 from railcar to unloader that is equipped with a control device. Resin is ultimately transferred to silos that are not equipped with a control device. The emissions of concern are particulate matter.

Emission Source/Control: DCCR2 - Control

Control Type: FABRIC FILTER

Emission Source/Control: DCCS1 - Control

Control Type: FABRIC FILTER

Emission Source/Control: CRT02 - Process

Emission Source/Control: CS100 - Process

Item 40.18:

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

Emission Unit: U-SOLID

Process: CS2

Source Classification Code: 3-08-999-99

Process Description:

This process includes the reprocessed polystyrene pellet (RPP) transfer system from the reclaim extruders to silos that are not equipped with a control device. The emissions of concern are particulate matter.

Emission Source/Control: CS200 - Process

Item 40.19:

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 OPS extrusion scrap collection system and associated fabric filter control. The emissions of concern are particulate matter.

Emission Source/Control: DCM05 - Control

Control Type: FABRIC FILTER

Emission Source/Control: OPS05 - Process



Item 40.20:

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

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: 09C02 - Control

Control Type: FABRIC FILTER

Emission Source/Control: CD-09 - Process

Item 40.21:

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: DCM53 - Control

Control Type: FABRIC FILTER

Emission Source/Control: CD-53 - Process

Item 40.22:

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: DCM54 - Control

Control Type: FABRIC FILTER

Emission Source/Control: CD-54 - Process

Item 40.23:

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 Antifog 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 41: Process Permissible Emissions
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 201-7.2

Item 41.1:

The sum of emissions from the regulated process cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit:	U-FOAMS	Process:	EX1
	CAS No: 0NY998-00-0		
	Name: VOC		
	PTE(s): 344 pounds per hour		344,268 pounds per year
Emission Unit:	U-FOAMS	Process:	RST
	CAS No: 0NY998-00-0		
	Name: VOC		
	PTE(s): 344 pounds per hour		344,268 pounds per year
Emission Unit:	U-FOAMS	Process:	TF1
	CAS No: 0NY998-00-0		
	Name: VOC		
	PTE(s): 344 pounds per hour		344,268 pounds per year

Condition 42: Compliance Certification
Effective for entire length of Permit

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

Item 42.1:

The Compliance Certification activity will be performed for:



Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 47: VOL storage tanks from 10000 - 20000 gallons
Effective for entire length of Permit

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

Item 47.1:
This Condition applies to Emission Unit: U-FOAMS
Process: T01

Item 47.2:
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 48: Compliance Certification
Effective for entire length of Permit

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

Item 48.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS
Process: TF1

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

Item 48.2:
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 Permit Limit: 344268 pounds per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12-month total, rolled monthly
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 49: Compliance Certification
Effective for entire length of Permit



Applicable Federal Requirement:6NYCRR 234.3(b)(2)

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PPCUP
Process: PRT

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

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Any owner or operator of an offset lithographic printing process subject to 6NYCRR Part 234 and employing fountain solutions containing volatile organic compounds shall not operate, cause, allow, or permit the operation of such process unless the fountain solution contains 10 percent by weight or less of VOC.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FOUNTAIN SOLUTION

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 10 percent by weight

Reference Test Method: Method 24, Manufacturers data

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 50: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 234.3(e)

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PPCUP
Process: PRT

Item 50.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity



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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

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

Parameter Monitored: OPACITY
Upper Permit Limit: 10 percent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification
Effective for entire length of Permit

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

Item 51.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-PPCUP
Process: PRT

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



Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 52: prohibition of sale or specification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.5(a)

Item 52.1:

This Condition applies to Emission Unit: U-PPCUP
Process: PRT

Item 52.2:

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

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



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

Condition 53: VOC content
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.5(b)

Item 53.1:
This Condition applies to **Emission Unit: U-PPCUP**
Process: PRT

Item 53.2:
Any person selling a coating or ink for use at a printing process subject to 6NYCRR Part 234 must, upon request, provide the user with certification of the volatile organic compound content of the coating or ink supplied.

Condition 54: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 234.6

Item 54.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-PPCUP
Process: PRT

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

Item 54.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The following work practices are prohibited:

- (a) using open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or ink/coating removal;
- (b) storage in open containers of spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;
- (c) use of open containers to store or dispose of inks and/or surface coatings; or
- (d) use of open containers to store or dispense inks and/or surface



coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

To ensure that these work practices are not in use, the facility will conduct daily inspections for the presence of any open containers as described in the prohibitions above and maintain a log book of these inspections. Any such open containers shall be closed immediately. The log book should include the following information at a minimum:

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

Monitoring Frequency: DAILY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 55: Recordkeeping, Reports of VOCs - EU Level
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 228.3(a)

Item 55.1:
This Condition applies to **Emission Unit: U-PPCUP**
Process: SLC

Item 55.2: Use of coatings that exceed the maximum permitted pounds of VOC per gallon, minus water and excluded VOC at application specified in table 1 of section 228.7 or table 2 of section 228.8 of 6 NYCRR Part 228 is prohibited.

Condition 56: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 228.4

Item 56.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-PPCUP
Process: SLC

Item 56.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to



perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the Method 9 test indicates that the opacity standard is not met.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 57: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 57.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-PPCUP
Process: SLC

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

Item 57.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part



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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 58: Use of Methods 311 or 24.
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 228.5(b)

**Item 58.1:
This Condition applies to Emission Unit: U-PPCUP
Process: SLC**

**Item 58.2:
Upon request by the Department, the owner and operator of any emission source subject to 6NYCRR Part 228, must use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, respectively (see table 1, section 200.9 of Title 6), to measure the volatile content, water content, density, volume of solids, and weight of solids in order to determine the actual VOC content of an as applied coating during a compliance demonstration.**

**Condition 59: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 228.5(c)

**Item 59.1:
The Compliance Certification activity will be performed for:**

**Emission Unit: U-PPCUP
Process: SLC**

**Item 59.2:
Compliance Certification shall include the following monitoring:**

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 60: Department access to obtain samples.
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 228.5(d)

Item 60.1:

This Condition applies to **Emission Unit: U-PPCUP**
Process: SLC

Item 60.2:

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

Condition 61: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 228.7

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PPCUP
Process: SLC

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

Item 61.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

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

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Monitoring Frequency: MONTHLY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME



(INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 62: Recordkeeping, Reports of VOCs - EU Level
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.3(a)

Item 62.1:

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

Item 62.2: Use of coatings that exceed the maximum permitted pounds of VOC per gallon, minus water and excluded VOC at application specified in table 1 of section 228.7 or table 2 of section 228.8 of 6 NYCRR Part 228 is prohibited.

Condition 63: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.4

Item 63.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-SILIC
Process: SIL

Item 63.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

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



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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 64: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 64.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-SILIC
Process: SIL

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

Item 64.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 65: Use of Methods 311 or 24.
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.5(b)

Item 65.1:
This Condition applies to Emission Unit: U-SILIC
Process: SIL

Item 65.2:
Upon request by the Department, the owner and operator of any emission source subject to 6NYCRR Part 228, must use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, respectively (see table 1, section 200.9 of Title 6), to measure the volatile content, water content, density, volume of solids, and weight of solids in order to determine the actual VOC content of an as applied coating during a compliance demonstration.

Condition 66: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.5(c)

Item 66.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-SILIC
Process: SIL

Item 66.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 67: Department access to obtain samples.
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.5(d)



Item 67.1:

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

Item 67.2:

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

Condition 68: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 228.7

Item 68.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-SILIC
Process: SIL

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

Item 68.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

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

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Monitoring Frequency: MONTHLY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 69: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 69.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-SOLID

Regulated Contaminant(s):



CAS No: 0NY075-00-0 PARTICULATES

Item 69.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility will follow the NYSDEC approved Operation and Maintenance Manual detailing procedures for all the emission unit U-SOLID processes, emission sources, and control devices. Any modification to the Operations and Maintenance Manual will be maintained on-site and made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 70: Recordkeeping, Reports of VOCs - EU Level
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.3(a)

Item 70.1:

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

Item 70.2: Use of coatings that exceed the maximum permitted pounds of VOC per gallon, minus water and excluded VOC at application specified in table 1 of section 228.7 or table 2 of section 228.8 of 6 NYCRR Part 228 is prohibited.

Condition 71: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.4

Item 71.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-SURFA
Process: ATM

Item 71.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the Method 9 test indicates that the opacity standard is not met.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 72: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 72.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-SURFA
Process: ATM

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

Item 72.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a



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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 73: Use of Methods 311 or 24.
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 228.5(b)

Item 73.1:

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

Item 73.2:

Upon request by the Department, the owner and operator of any emission source subject to 6NYCRR Part 228, must use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, respectively (see table 1, section 200.9 of Title 6), to measure the volatile content, water content, density, volume of solids, and weight of solids in order to determine the actual VOC content of an as applied coating during a compliance demonstration.

**Condition 74: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 228.5(c)

Item 74.1:

The Compliance Certification activity will be performed for:

**Emission Unit: U-SURFA
Process: ATM**

Item 74.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 75: Department access to obtain samples.
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 228.5(d)

Item 75.1:
This Condition applies to Emission Unit: U-SURFA
Process: ATM

Item 75.2:
Representatives of the Department must be permitted during reasonable business hours, to obtain coating samples for the purpose of determining compliance with 6 NYCRR Part 228.

Condition 76: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 228.7

Item 76.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-SURFA
Process: ATM

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

Item 76.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:

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

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 2.9 pounds per gallon
Monitoring Frequency: MONTHLY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME
(INSTANTANEOUS/DISCRETE OR GRAB)



Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

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

Condition 77: Contaminant List
Effective for entire length of Permit

Applicable State Requirement:ECL 19-0301

Item 77.1:

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

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

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

Condition 78: Unavoidable noncompliance and violations



Effective for entire length of Permit

Applicable State Requirement:6NYCRR 201-1.4

Item 78.1:

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

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.



(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 79: Air pollution prohibited
Effective for entire length of Permit

Applicable State Requirement:6NYCRR 211.2

Item 79.1:

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 80: Emissions from new emission sources and/or modifications
Effective for entire length of Permit

Applicable State Requirement:6NYCRR 212.4(a)

Item 80.1:

This Condition applies to:

Emission Unit: UDENSI

Emission Unit: UFOAMS

Emission Unit: UOPSEX

Emission Unit: UPPCUP

Emission Unit: UPYROL

Item 80.2:

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.

