

New York State Department of Environmental Conservation
Facility DEC ID: 8543000017



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 8-5430-00017/00092
Effective Date: 09/19/2007 Expiration Date: 09/18/2012

Permit Issued To: PLIANT CORP
1515 WOODFIELD RD - SUITE 600
SCHAUMBURG, IL 60173

Facility: PLIANT CORPORATION
200 EAST MAIN ST
MACEDON, NY 14502

Contact: GORDON PICKERING
PLIANT CORP
200 EAST MAIN ST
MACEDON, NY 14502
(315) 986-6047

Description:

Renewal and modification of Title V Facility Permit originally issued March 28, 2000 for polyethylene film extrusion, color flexographic printing, and plastic bag production.

The facility is subject to Title V permitting requirements due to potential facility emissions of volatile organic compounds (VOC) of over 250 tons per year.

An Administrative Amendment effective May 9, 2002 reflected an owner name change from Huntsman Packaging Corporation to the present Pliant Corporation.

In addition to renewal, this Title V Facility Permit authorizes the addition of 2 new color presses to the existing 20 press printing unit. This permit also includes conditions to limit the VOC emission increase due to the 2 new presses to below the 40 ton per year increase threshold in 6 NYCRR Part 231 New Source Review in Ozone Transport Regions.

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

Permit Administrator: DAVID L BIMBER
DIVISION OF ENVIRONMENTAL PERMITS
6274 EAST AVON LIMA RD

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AVON, NY 14414-9519

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for permit renewals, modifications and transfers

Applications for Permit Renewals and Modifications

Permit modifications, suspensions or revocations by the Department

Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of 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:



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

Item 4.1:

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 4.2:

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 4.3:

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

Item 5.1:

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

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

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

Item 6.1:

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;

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

Applicable State Requirement: 6NYCRR 621.6(a)

Item 7.1:

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

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



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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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1515 WOODFIELD RD - SUITE 600
SCHAUMBURG, IL 60173

Facility:

PLIANT CORPORATION
200 EAST MAIN ST
MACEDON, NY 14502

Authorized Activity By Standard Industrial Classification Code:

2673 - BAGS: PLASTICS, LAMINATED AND COATED

3081 - UNSUPPORTED PLASTICS FILM AND SHEET

Permit Effective Date: 09/19/2007

Permit Expiration Date: 09/18/2012



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 24 6NYCRR 201-6.5(g): Non Applicable requirements
- 25 6NYCRR 228.7: Compliance Certification
- 26 40CFR 63.820(a)(2), Subpart KK: Compliance Certification

Emission Unit Level

- 27 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 28 6NYCRR 201-6: Process Definition By Emission Unit
- 29 6NYCRR 201-7.2: Process Permissible Emissions

EU=A-DHEAS,Proc=004

- 30 6NYCRR 228.1(d): Will remain subject to Part 228.
- 31 6NYCRR 228.3(a): Compliance Certification
- 32 6NYCRR 228.4: Compliance Certification
- 33 6NYCRR 228.5(a): Compliance Certification
- 34 6NYCRR 228.5(b): Use of Methods 311 or 24.
- 35 6NYCRR 228.5(d): Department access to obtain samples.
- 36 6NYCRR 228.5(j): Compliance Certification



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- 37 6NYCRR 228.5(k): Compliance Certification
- 38 6NYCRR 228.6(a): Prohibition of sale.
- 39 6NYCRR 228.10: Compliance Certification

EU=H-PRINT,Proc=002

- 40 6NYCRR 234.1(g): Facilities subject to Part 234 remain subject even if emissions go below applicability threshold
- 41 6NYCRR 234.3(e): Compliance Certification
- 42 6NYCRR 234.5(a): prohibition of sale or specification
- 43 6NYCRR 234.5(b): VOC content
- 44 6NYCRR 234.6: Compliance Certification

EU=H-PRINT,Proc=002,ES=0X002

- 45 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 46 6NYCRR 234.4(c)(1): Compliance Certification
- 47 6NYCRR 234.4(c)(2): Compliance Certification

EU=H-PRINT,Proc=002,ES=H562A

- 48 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 49 6NYCRR 234.4(c)(1): Compliance Certification
- 50 6NYCRR 234.4(c)(2): Compliance Certification

EU=H-PRINT,Proc=002,ES=HP560

- 51 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 52 6NYCRR 234.4(c)(1): Compliance Certification
- 53 6NYCRR 234.4(c)(2): Compliance Certification

EU=H-PRINT,Proc=002,ES=MF563

- 54 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 55 6NYCRR 234.4(c)(1): Compliance Certification
- 56 6NYCRR 234.4(c)(2): Compliance Certification

EU=H-PRINT,Proc=002,ES=OX001

- 57 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 58 6NYCRR 234.4(c)(1): Compliance Certification
- 59 6NYCRR 234.4(c)(2): Compliance Certification

EU=H-PRINT,Proc=002,ES=PP001

- *60 6NYCRR 201-7.2: Capping Monitoring Condition

EU=H-PRINT,Proc=002,ES=PP002

- *61 6NYCRR 201-7.2: Capping Monitoring Condition

EU=H-TREAT,Proc=003

- 62 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications
- 63 6NYCRR 212.6(a): Compliance Certification

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EU=I-NKMIX,Proc=006

64 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

65 6NYCRR 212.6(a): Compliance Certification

EU=I-NKMIX,Proc=007

66 6NYCRR 229.3(e)(2)(v): VOL storage tanks less than 10000 gallons

EU=P-LATES,Proc=001

67 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications

68 6NYCRR 212.6(a): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

69 ECL 19-0301: Contaminant List

70 6NYCRR 201-1.4: Unavoidable noncompliance and violations

71 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

EU=H-TREAT,Proc=003

72 6NYCRR 212.4(c): Compliance Demonstration

EU=I-NKMIX,Proc=006

73 6NYCRR 212.4(c): Compliance Demonstration

EU=P-LATES,Proc=001

74 6NYCRR 212.4(c): Compliance Demonstration

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



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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 - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in



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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

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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



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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

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

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

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

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

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

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 09/19/2007 and 09/18/2012

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



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any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 2.1:

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

Condition 3: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 3.1:

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

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

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

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

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable



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regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

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

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

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

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

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

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

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

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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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



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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 1/30/2008.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 202-2.1

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

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Emission statements shall be submitted on or before April
15th each year for emissions of the previous calendar
year.

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

Condition 8: Recordkeeping requirements
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 202-2.5



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Item 8.1:

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

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

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

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:

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

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

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

Condition 10: Maintenance of Equipment
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 201-1.7



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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 between the dates of 09/19/2007 and 09/18/2012

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 between the dates of 09/19/2007 and 09/18/2012

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

Item 13.1:

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

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 14.1:

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

Condition 15: Standard Requirement - Provide Information

Effective between the dates of 09/19/2007 and 09/18/2012



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

Item 15.1:

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

Condition 16: General Condition - Right to Inspect
Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 16.1:

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

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

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 09/19/2007 and 09/18/2012

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



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preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 18.1:

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

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

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

Condition 19: Required Emissions Tests
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:

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

Condition 20: Visible Emissions Limited
Effective between the dates of 09/19/2007 and 09/18/2012

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



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having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 21: Accidental release provisions.
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 40CFR 68

Item 21.1:

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

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

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

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:

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

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

Condition 23: Emission Unit Definition
Effective between the dates of 09/19/2007 and 09/18/2012

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Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:

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

Emission Unit: A-DHEAS

Emission Unit Description:

TWO (2) OUTBOARD GRAVURE COATING DECKS IN LINE WITH PRINTING EQUIPMENT AND ONE (1) FILM LAMINATION PROCESS (E-BEAM). BOTH COATING DECKS EXHAUST THROUGH INDIVIDUAL HOT AIR DRYERS TO TWO (2) SEPARATE EMISSION POINTS. APPLICATION IS COMPLIANT ADHESIVE. THE E-BEAM PROCESS EXHAUSTS THROUGH A HOT AIR DRYER TO AN INDIVIDUAL EMISSION POINT.

Building(s): 19
26

Item 23.2:

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

Emission Unit: H-PRINT

Emission Unit Description:

TWO (2) TEN COLOR, SIX (6) EIGHT COLOR, FIVE (5) SIX COLOR, EIGHT (8) FOUR COLOR, AND ONE (1) TWO COLOR FLEXOGRAPHIC PRINTING PRESSES ALL EXHAUSTING THROUGH INDIVIDUAL HOT AIR DRYERS. ALL OF THE DRYERS EXHAUST THROUGH ONE OF FOUR CATALYTIC AFTER BURNERS. AFTER BURNER NUMBER 1, MF563, SERVICES ONE (1) EIGHT COLOR PRESS LINE 563. AFTERBURNER NUMBER 1, MF563, SERVICES TWO EIGHT COLOR PRESSES - LINES 563 AND PP002. AFTERBURNER NUMBER 2, H562A, SERVICES FIVE (5) SIX COLOR PRESSES LINES 520, 521, 529, 561, AND 562. H562A ALSO SERVICES ONE (1) FOUR COLOR PRESS LINE 523. AFTERBURNER NUMBER 3, HP560, SERVICES THREE (3) EIGHT COLOR PRESSES, LINES 522, 525 AND 526, SEVEN (7) FOUR COLOR PRESSES LINES 524, 560, 552A, 552B, 553A, 553B AND 557B, AND ONE (1) TWO COLOR PRESS LINE 555A. AFTERBURNER NUMBER 4, OX001 SERVICES ONE TEN COLOR PRESS, LINE/SOURCE PP001. AFTERBURNER NUMBER 5, OX002 SERVICES ONE EIGHT-COLOR PRESS, LINE/SOURCE PP003 AND ONE TEN-COLOR PRESS, LINE/SOURCE PP004.



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Building(s): 18
19
26

Item 23.3:

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

Emission Unit: H-TREAT

Emission Unit Description:

ELECTROSTATIC DISCHARGE FILM TREATERS.
THE TREATERS MAKE THE POLYETHYLENE
SUBSTRATE PRINTABLE.

Building(s): 14
18
20A
26

Item 23.4:

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

Emission Unit: I-NKMIX

Emission Unit Description:

TWO (2) INK MIXING ROOMS, ONE (1) INK PAIL
WASHING ROOM (4) ALCOHOL STORAGE TANKS

Building(s): 18
OUTSIDE

Item 23.5:

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

Emission Unit: P-LATES

Emission Unit Description:

FLEXOGRAPHIC PLATE MANUFACTURING AREA.

Building(s): 27

Condition 24: Non Applicable requirements

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 24.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6NYCRR 231-2

Emission Unit: HPRINT Process: 002 Source: PP004



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Reason: The emissions associated with this project and its associated sources do not trigger New Source Review. This determination is based on a 96% overall control efficiency for emissions generated by the new 8-color and 10-color printing presses.

6NYCRR 231-2

Emission Unit: HPRINT Process: 002 Source: PP003

Reason: The emissions associated with this project and its associated sources do not trigger New Source Review. This determination is based on a 96% overall control efficiency for emissions generated by the new 8-color and 10-color printing presses.

Condition 25: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 228.7

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The maximum permitted pounds of VOC per gallon (minus water and excluded VOC) of coating at application, for paper coating lines is 2.9

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING LINES

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.



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

Condition 26: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 40CFR 63.820(a)(2), Subpart KK

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each new or existing facility at which publication rotogravure, product or packaging rotogravure, or wide web flexographic printing presses are operated for which the owner or operator chooses to commit to, and meets, the criteria of paragraphs §63.820 (a)(2)(i) and (ii) for purposes of establishing the facility to be an area source with respect to this subpart:

(i) Use less than 10 tons per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing, and

(ii) Use less than 25 tons per each rolling 12-month period of any combination of HAPs at the facility, including materials used for source categories or purposes other than printing and publishing.

Facilities meeting the above description are required to meet the provisions of recordkeeping and reporting as described in §63.829(d) and §63.830(b)(1).

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

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

Condition 27: Emission Point Definition By Emission Unit
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 27.1:

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

Emission Unit: A-DHEAS

Emission Point: EBPT1

Height (ft.): 35

Diameter (in.): 28

Building: 19

Emission Point: H561B

Height (ft.): 26

Length (in.): 24

Width (in.): 22

Building: 26

Emission Point: H562B

Height (ft.): 26

Length (in.): 24

Width (in.): 22

Building: 26

Item 27.2:

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

Emission Unit: H-PRINT

Emission Point: EP001

Height (ft.):

Length (in.):

Width (in.):

Emission Point: EP004

Height (ft.): 30

Diameter (in.): 33

Emission Point: H5621

Height (ft.): 30

Diameter (in.): 33

Building: OUTSIDE

Emission Point: H5622

Height (ft.): 30

Diameter (in.): 33

Building: OUTSIDE

Emission Point: HP560

Height (ft.): 30

Diameter (in.): 50

NYTMN (km.): 4771.221 NYTME (km.): 313.029

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Emission Point: MF563
Height (ft.): 41 Diameter (in.): 28
NYTMN (km.): 4771.221 NYTME (km.): 313.029

Item 27.3:

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

Emission Unit: H-TREAT

Emission Point: EP005
Height (ft.): 24 Diameter (in.): 12

Emission Point: M511D
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4771.221 NYTME (km.): 313.029

Emission Point: M518A
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4771.221 NYTME (km.): 313.029

Emission Point: MF035
Height (ft.): 24 Diameter (in.): 12
NYTMN (km.): 4771.221 NYTME (km.): 313.029

Emission Point: MF036
Height (ft.): 24 Diameter (in.): 16
NYTMN (km.): 4771.221 NYTME (km.): 313.029

Emission Point: MF515
Height (ft.): 29 Diameter (in.): 12
NYTMN (km.): 4771.221 NYTME (km.): 313.029

Item 27.4:

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

Emission Unit: I-NKMIX

Emission Point: MF006
Height (ft.): 22 Diameter (in.): 12
NYTMN (km.): 4771.221 NYTME (km.): 313.029

Emission Point: MF200
Height (ft.): 25 Diameter (in.): 2
NYTMN (km.): 4771.221 NYTME (km.): 313.029

Item 27.5:



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

Emission Unit: P-LATES

Emission Point: EP002

Height (ft.): 30

Diameter (in.): 16

Building: 27

Emission Point: EP003

Height (ft.): 30

Diameter (in.): 16

Building: 27

Emission Point: MF039

Height (ft.): 30

Diameter (in.): 16

NYTMN (km.): 4771.221 NYTME (km.): 313.029 Building: 27

**Condition 28: Process Definition By Emission Unit
Effective between the dates of 09/19/2007 and 09/18/2012**

Applicable Federal Requirement: 6NYCRR 201-6

Item 28.1:

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

Emission Unit: A-DHEAS

Process: 004

Source Classification Code: 4-02-013-01

Process Description:

GRAVURE COATING AND E-BEAM LAMINATION
OPERATIONS. LIQUID COATINGS ARE APPLIED TO
PLASTIC FILMS AND DRYED USING HOT AIR
DRYERS. COATINGS HAVE LESS THAN 2.9 LBS
VOC PER GALLON MINUS WATER AND EXEMPT VOC.

Emission Source/Control: EB001 - Process

Emission Source/Control: H561B - Process

Design Capacity: 3,516 tons per year

Emission Source/Control: H562B - Process

Design Capacity: 4,564 tons per year

Item 28.2:

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

Emission Unit: H-PRINT

Process: 002

Source Classification Code: 4-05-003-01

Process Description:

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FLEXOGRAPHIC PRINTING OPERATIONS. FLUID INKS ARE APPLIED TO PLASTIC FILM SUBSTRATE AND DRYED USING HOT AIR DRYERS. PRINTING OCCURS IN BUILDINGS 18, 19, 25, AND 26.

Emission Source/Control: OX002 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: H562A - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: HP560 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: MF563 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: OX001 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00520 - Process
Design Capacity: 1,926 tons per year

Emission Source/Control: 00521 - Process
Design Capacity: 2,241 tons per year

Emission Source/Control: 00522 - Process
Design Capacity: 2,366 tons per year

Emission Source/Control: 00523 - Process
Design Capacity: 1,135 tons per year

Emission Source/Control: 00524 - Process
Design Capacity: 2,270 tons per year

Emission Source/Control: 00525 - Process
Design Capacity: 2,360 tons per year

Emission Source/Control: 00526 - Process
Design Capacity: 2,366 tons per year

Emission Source/Control: 00529 - Process
Design Capacity: 2,555 tons per year



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Emission Source/Control: 00560 - Process
Design Capacity: 2,056 tons per year

Emission Source/Control: 00561 - Process
Design Capacity: 3,516 tons per year

Emission Source/Control: 00562 - Process
Design Capacity: 4,564 tons per year

Emission Source/Control: 00563 - Process
Design Capacity: 2,856 tons per year

Emission Source/Control: 0552A - Process
Design Capacity: 611.5 tons per year

Emission Source/Control: 0552B - Process
Design Capacity: 611.5 tons per year

Emission Source/Control: 0553A - Process
Design Capacity: 611.5 tons per year

Emission Source/Control: 0553B - Process
Design Capacity: 611.5 tons per year

Emission Source/Control: 0555A - Process
Design Capacity: 611.5 tons per year

Emission Source/Control: 0557B - Process
Design Capacity: 611.5 tons per year

Emission Source/Control: PP001 - Process

Emission Source/Control: PP002 - Process

Emission Source/Control: PP003 - Process

Emission Source/Control: PP004 - Process

Item 28.3:

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

Emission Unit: H-TREAT

Process: 003

Source Classification Code: 4-05-003-01

Process Description:

ELECTRO STATIC SURFACE TREATMENT OF
POLYETHYLENE FILM WHICH INCREASES THE
SURFACE TENSION ENERGY TO MAKE IT

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PRINTABLE. THE POLYETHYLENE FILM IS TRANSPORTED INTO A TREATMENT STATION WHERE IT IS SUPPORTED ON A DIELECTRIC COVERED ROLL AND A CORONA IS IMPINGED ONTO THE SURFACE OF THE FILM. AN ELECTRONIC POWER CONVERTER CREATES HIGH FREQUENCY (9,600 HERTZ) HIGH VOLTAGE (10,000V) FROM INDUSTRIAL POWER TO CREATE THE CORONA DISCHARGE. A BY-PRODUCT OF THE CORONA DISCHARGE IS OZONE.

PROCESS OCURRS IN BUILDINGS 14, 20A, 26, AND 18.

Emission Source/Control: C0001 - Control
Control Type: CATALYTIC REDUCTION

Emission Source/Control: M511D - Control
Control Type: CATALYTIC REDUCTION

Emission Source/Control: M518A - Control
Control Type: CATALYTIC REDUCTION

Emission Source/Control: MF515 - Control
Control Type: CATALYTIC REDUCTION

Emission Source/Control: 0510T - Process
Design Capacity: 10 kilowatts

Emission Source/Control: 0511T - Process
Design Capacity: 10 kilowatts

Emission Source/Control: 0515T - Process
Design Capacity: 30 kilowatts

Emission Source/Control: 0518T - Process
Design Capacity: 30 kilowatts

Emission Source/Control: MF035 - Process
Design Capacity: 10 kilowatts

Emission Source/Control: MF036 - Process
Design Capacity: 25 kilowatts

Emission Source/Control: MF037 - Process

Item 28.4:



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

Emission Unit: I-NKMIX

Process: 006

Source Classification Code: 4-01-003-35

Process Description: WASHING OF SOILED INK PAILS.

Emission Source/Control: MF006 - Process

Item 28.5:

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

Emission Unit: I-NKMIX

Process: 007

Source Classification Code: 4-90-002-01

Process Description:

STORAGE OF POLYAMIDE (SOLVENT BASE) INKS
AND SOLVENTS. (PROPANOL STORED IN FOUR (4)
UNDERGROUND STORAGE TANKS WITH VOLUME OF
4,000 GALLONS EACH.)

Emission Source/Control: MF200 - Process

Design Capacity: 4,000 gallons

Emission Source/Control: MF201 - Process

Design Capacity: 4,000 gallons

Emission Source/Control: MF202 - Process

Design Capacity: 4,000 gallons

Emission Source/Control: MF203 - Process

Design Capacity: 4,000 gallons

Item 28.6:

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

Emission Unit: P-LATES

Process: 001

Source Classification Code: 4-05-003-11

Process Description:

PRODUCTION OF PRINTING PLATES FOR USE ON
FLEXOGRAPHIC PRINTING PRESSES.

Emission Source/Control: MF039 - Process

Design Capacity: 3,300 cubic feet per minute

Emission Source/Control: MF040 - Process

Emission Source/Control: MF041 - Process



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Condition 29: Process Permissible Emissions
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 29.1:

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: H-PRINT Process: 002

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 9 pounds per hour

80,000 pounds per year

Condition 30: Will remain subject to Part 228.
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 228.1(d)

Item 30.1:

This Condition applies to Emission Unit: A-DHEAS
Process: 004

Item 30.2:

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 31: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 228.3(a)

Item 31.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-DHEAS

Process: 004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 31.2:

Compliance Certification shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 32: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 228.4

Item 32.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-DHEAS

Process: 004

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source subject to this requirement, 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 semi-annually while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance



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are occurring or have occurred from a process source.

If visible emissions above those that are normal and in compliance with section 228.4 are detected (this may be zero percent opacity for many or all of the subject emission sources), the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected. If the permittee expects the excess visible emissions to occur in excess of 1 hour after discovery, the Department will be notified immediately.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

If the opacity is determined to exceed the limits of section 228.4, the facility will be determined to be in violation, the permittee will remedy the problem, and will contact the Department. The provisions of Part 201-1.4 shall apply.

The semiannual monitoring report and annual compliance certifications required of all permittees subject to Title V must include a summary of these observations.

Reference Test Method: EPA Method 9

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.

The initial report is due 1/30/2008.

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

Condition 33: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 33.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-DHEAS



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Process: 004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 34: Use of Methods 311 or 24.

Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 228.5(b)

Item 34.1:

This Condition applies to Emission Unit: A-DHEAS

Process: 004

Item 34.2:

Upon request by the Department, the owner and operator of any emission source subject to



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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 35: Department access to obtain samples.
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 228.5(d)

Item 35.1:

This Condition applies to Emission Unit: A-DHEAS
Process: 004

Item 35.2:

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 36: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 228.5(j)

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-DHEAS
Process: 004

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 37: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 228.5(k)

Item 37.1:



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The Compliance Certification activity will be performed for:

Emission Unit: A-DHEAS

Process: 004

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 38: Prohibition of sale.

Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 228.6(a)

Item 38.1:

This Condition applies to Emission Unit: A-DHEAS

Process: 004

Item 38.2:

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 6NYCRR Part 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 6NYCRR 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 6NYCRR 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 6NYCRR Part 228.

Condition 39: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

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Applicable Federal Requirement: 6NYCRR 228.10

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-DHEAS

Process: 004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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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.

The initial report is due 1/30/2008.

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

**Condition 40: Facilities subject to Part 234 remain subject even if emissions go below applicability threshold
Effective between the dates of 09/19/2007 and 09/18/2012**

Applicable Federal Requirement: 6NYCRR 234.1(g)

Item 40.1:

This Condition applies to Emission Unit: H-PRINT
Process: 002

Item 40.2:

Any printing process that is subject to the provisions of 6NYCRR Part 234 will remain subject to these provisions even if the emissions of volatile organic compounds from the facility later fall below the applicability criteria.

**Condition 41: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012**

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT
Process: 002



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Item 41.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 10 percent or greater for any consecutive six-minute period from any emission source subject to 6NYCRR Part 234.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Monitoring Frequency: WEEKLY

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 42: prohibition of sale or specification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 234.5(a)

Item 42.1:

This Condition applies to Emission Unit: H-PRINT

Process: 002

Item 42.2:

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 43: VOC content
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 234.5(b)



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Item 43.1:

This Condition applies to Emission Unit: H-PRINT
Process: 002

Item 43.2:

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 44: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 234.6

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT
Process: 002

Item 44.2:

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.

Open containers, if found, shall be covered and such



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deviations shall be noted in a log maintained in the operating area. The log should include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 45: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: 0X002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The capture system and the air cleaning device used to control emissions for any flexographic printing process must provide for an overall reduction in VOC emissions of at least 60 percent. Stack emissions testing used to verify compliance with this limit should be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing should be completed within 180 days after permit issuance.

Parameter Monitored: VOC

Lower Permit Limit: 60 percent reduction by weight

Reference Test Method: Method 25 (40CFR60)

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT



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Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 2/29/2008.

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

Condition 46: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 234.4(c)(1)

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: 0X002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 46.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The exhaust gas temperature from all incinerators used to comply with 6NYCRR Part 234 shall be monitored continuously. The temperature of the exhaust gas shall not fall below the minimum temperature at which compliance with Part 234 has been demonstrated by performance test.

The continuous monitor shall be installed, periodically calibrated, and operated at all times that the incinerator is operating.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 25 degrees C below the approved
performance test combustion
temperature

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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The initial report is due 1/30/2008.

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

Condition 47: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: 0X002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 47.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The temperature rise across the bed of a catalytic incinerator shall be monitored continuously in order to demonstrate compliance with Part 234. The temperature change across the bed shall not fall below the minimum temperature change (listed below in the limit box) at which compliance with Part 234 has been demonstrated by performance tests.

The continuous monitor shall be installed and calibrated according to the manufacturer's specifications, and shall be operated at all times that the catalytic incinerator is operating.

Parameter Monitored: TEMPERATURE CHANGE

Lower Permit Limit: 5 degrees C below the approved
performance test combustion
temperature

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

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Condition 48: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT
Process: 002 Emission Source: H562A

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

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The capture system and the air cleaning device used to control emissions for any flexographic printing process must provide for an overall reduction in VOC emissions of at least 60 percent. Stack emissions testing used to verify compliance with this limit should be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing should be completed within 180 days after permit issuance.

Parameter Monitored: VOC

Lower Permit Limit: 60 percent reduction by weight

Reference Test Method: Method 25 (40CFR60)

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 2/29/2008.

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

Condition 49: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 234.4(c)(1)

Item 49.1:

The Compliance Certification activity will be performed for:

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Emission Unit: H-PRINT

Process: 002

Emission Source: H562A

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 49.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The exhaust gas temperature from all incinerators used to comply with 6NYCRR Part 234 shall be monitored continuously. The temperature of the exhaust gas shall not fall below the minimum temperature at which compliance with Part 234 has been demonstrated by performance test.

The continuous monitor shall be installed, periodically calibrated, and operated at all times that the incinerator is operating.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 25 degrees C below the approved
performance test combustion
temperature

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 50: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: H562A



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

Item 50.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The temperature rise across the bed of a catalytic incinerator shall be monitored continuously in order to demonstrate compliance with Part 234. The temperature change across the bed shall not fall below the minimum temperature change (listed below in the limit box) at which compliance with Part 234 has been demonstrated by performance tests.

The continuous monitor shall be installed and calibrated according to the manufacturer's specifications, and shall be operated at all times that the catalytic incinerator is operating.

Parameter Monitored: TEMPERATURE CHANGE

Lower Permit Limit: 5 degrees C below the approved
performance test combustion
temperature

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 51: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT
Process: 002 Emission Source: HP560

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

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Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The capture system and the air cleaning device used to control emissions for any flexographic printing process must provide for an overall reduction in VOC emissions of at least 60 percent. Stack emissions testing used to verify compliance with this limit should be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing should be completed within 180 days after permit issuance.

Parameter Monitored: VOC

Lower Permit Limit: 60 percent reduction by weight

Reference Test Method: Method 25 (40CFR60)

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 52: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 234.4(c)(1)

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: HP560

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 52.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The exhaust gas temperature from all incinerators used to comply with 6NYCRR Part 234 shall be monitored continuously. The temperature of the exhaust gas shall not fall below the minimum temperature at which compliance



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with Part 234 has been demonstrated by performance test.

The continuous monitor shall be installed, periodically calibrated, and operated at all times that the incinerator is operating.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 25 degrees C below the approved performance test combustion temperature

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 53: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: HP560

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 53.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The temperature rise across the bed of a catalytic incinerator shall be monitored continuously in order to demonstrate compliance with Part 234. The temperature change across the bed shall not fall below the minimum temperature change (listed below in the limit box) at which compliance with Part 234 has been demonstrated by performance tests.



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The continuous monitor shall be installed and calibrated according to the manufacturer's specifications, and shall be operated at all times that the catalytic incinerator is operating.

Parameter Monitored: TEMPERATURE CHANGE

Lower Permit Limit: 5 degrees C below the approved performance test combustion temperature

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 54: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: MF563

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The capture system and the air cleaning device used to control emissions for any flexographic printing process must provide for an overall reduction in VOC emissions of at least 60 percent. Stack emissions testing used to verify compliance with this limit should be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing should be completed within 180 days after permit issuance.

Parameter Monitored: VOC

Lower Permit Limit: 60 percent reduction by weight



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Reference Test Method: Method 25 (40CFR60)

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 55: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 234.4(c)(1)

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: MF563

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 55.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The exhaust gas temperature from all incinerators used to comply with 6NYCRR Part 234 shall be monitored continuously. The temperature of the exhaust gas shall not fall below the minimum temperature at which compliance with Part 234 has been demonstrated by performance test.

The continuous monitor shall be installed, periodically calibrated, and operated at all times that the incinerator is operating.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 25 degrees C below the approved
performance test combustion
temperature

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.



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

Condition 56: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: MF563

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 56.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The temperature rise across the bed of a catalytic incinerator shall be monitored continuously in order to demonstrate compliance with Part 234. The temperature change across the bed shall not fall below the minimum temperature change (listed below in the limit box) at which compliance with Part 234 has been demonstrated by performance tests.

The continuous monitor shall be installed and calibrated according to the manufacturer's specifications, and shall be operated at all times that the catalytic incinerator is operating.

Parameter Monitored: TEMPERATURE CHANGE

Lower Permit Limit: 5 degrees C below the approved
performance test combustion
temperature

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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



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Condition 57: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 57.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: OX001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 57.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The capture system and the air cleaning device used to control emissions for any flexographic printing process must provide for an overall reduction in VOC emissions of at least 60 percent. Stack emissions testing used to verify compliance with this limit should be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing should be completed within 180 days after permit issuance.

Parameter Monitored: VOC

Lower Permit Limit: 60 percent reduction by weight

Reference Test Method: Method 25 (40CFR60)

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 58: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 234.4(c)(1)

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: OX001



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

Item 58.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The exhaust gas temperature from all incinerators used to comply with 6NYCRR Part 234 shall be monitored continuously. The temperature of the exhaust gas shall not fall below the minimum temperature at which compliance with Part 234 has been demonstrated by performance test.

The continuous monitor shall be installed, periodically calibrated, and operated at all times that the incinerator is operating.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 25 degrees C below the approved
performance test combustion
temperature

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 59: Compliance Certification

Effective between the dates of 09/19/2007 and 09/18/2012

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

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: OX001

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

Item 59.2:

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Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The temperature rise across the bed of a catalytic incinerator shall be monitored continuously in order to demonstrate compliance with Part 234. The temperature change across the bed shall not fall below the minimum temperature change (listed below in the limit box) at which compliance with Part 234 has been demonstrated by performance tests.

The continuous monitor shall be installed and calibrated according to the manufacturer's specifications, and shall be operated at all times that the catalytic incinerator is operating.

Parameter Monitored: TEMPERATURE CHANGE

Lower Permit Limit: 5 degrees C below the approved
performance test combustion
temperature

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 60: Capping Monitoring Condition

Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 60.1:

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 60.2:

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

Item 60.3:



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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 60.4:

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 60.5:

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 60.6:

The Compliance Certification activity will be performed for:

Emission Unit: H-PRINT

Process: 002

Emission Source: PP001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 60.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Pliant Corporation will limit emissions of volatile organic compounds (VOC) from the 10-color printing press (emission source PP001) and the 8-color printing press (emission source PP002) to less than the 40 tons per year major NEW Source Review applicability threshold, calculated on a rolling twelve month basis. Pliant will maintain monthly solvent/ink usage records and calculate monthly emissions applying demonstrated capture and control efficiencies from the most recent source sampling result, or using other emission factors the Department deems reasonable. Records will be maintained on site for a minimum of five years and will be made available to the Department upon request.



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Permit ID: 8-5430-00017/00092

Facility DEC ID: 8543000017

Process Material: INKS, SOLVENTS AND ADHESIVES
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 39.9 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-month rolling average
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 61: Capping Monitoring Condition
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 61.1:

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 61.2:

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

Item 61.3:

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 61.4:

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 61.5:

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 61.6:

The Compliance Certification activity will be performed for:



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Emission Unit: H-PRINT

Process: 002

Emission Source: PP002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 61.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Pliant Corporation will limit emissions of volatile organic compounds (VOC) from the 10-color printing press (emission source PP001) and the 8-color printing press (emission source PP002) to less than the 40 tons per year major NEW Source Review applicability threshold, calculated on a rolling twelve month basis. Pliant will maintain monthly solvent/ink usage records and calculate monthly emissions applying demonstrated capture and control efficiencies from the most recent source sampling result, or using other emission factors the Department deems reasonable. Records will be maintained on site for a minimum of five years and will be made available to the Department upon request.

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 39.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-month rolling average

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

**Condition 62: Emissions from new emission sources and/or modifications
Effective between the dates of 09/19/2007 and 09/18/2012**

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 62.1:

This Condition applies to Emission Unit: H-TREAT

Process: 003

Item 62.2:



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

Condition 63: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 63.1:

The Compliance Certification activity will be performed for:

Emission Unit: H-TREAT
Process: 003

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 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



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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: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

**Condition 64: Emissions from new emission sources and/or modifications
Effective between the dates of 09/19/2007 and 09/18/2012**

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 64.1:

This Condition applies to Emission Unit: I-NKMIX
Process: 006

Item 64.2:

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

**Condition 65: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012**

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: I-NKMIX
Process: 006

Item 65.2:

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



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Facility DEC ID: 8543000017

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: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

**Condition 66: VOL storage tanks less than 10000 gallons
Effective between the dates of 09/19/2007 and 09/18/2012**

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

Item 66.1:

This Condition applies to Emission Unit: I-NKMIX



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Permit ID: 8-5430-00017/00092

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Process: 007

Item 66.2:

Volatile organic liquid tanks with a capacity of less than 10,000 gallons must be equipped with a conservation vent.

**Condition 67: Emissions from new emission sources and/or modifications
Effective between the dates of 09/19/2007 and 09/18/2012**

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 67.1:

This Condition applies to Emission Unit: P-LATES
Process: 001

Item 67.2:

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

**Condition 68: Compliance Certification
Effective between the dates of 09/19/2007 and 09/18/2012**

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 68.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-LATES
Process: 001

Item 68.2:

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

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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: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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 69: Contaminant List
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable State Requirement: ECL 19-0301

Item 69.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this



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permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 70: Unavoidable noncompliance and violations
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable State Requirement: 6NYCRR 201-1.4

Item 70.1:

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 superseded 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.



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(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 71: Air pollution prohibited
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable State Requirement: 6NYCRR 211.2

Item 71.1:

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

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

Condition 72: Compliance Demonstration
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable State Requirement: 6NYCRR 212.4(c)

Item 72.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: H-TREAT
Process: 003

Item 72.2:

Compliance Demonstration 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.



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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

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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

Condition 73: Compliance Demonstration
Effective between the dates of 09/19/2007 and 09/18/2012



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Facility DEC ID: 8543000017

Applicable State Requirement: 6NYCRR 212.4(c)

Item 73.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: I-NKMIX

Process: 006

Item 73.2:

Compliance Demonstration 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



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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
Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 74: Compliance Demonstration
Effective between the dates of 09/19/2007 and 09/18/2012

Applicable State Requirement: 6NYCRR 212.4(c)

Item 74.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-LATES
Process: 001

Item 74.2:

Compliance Demonstration 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

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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

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

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