



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1422-00428/00001
Mod 0 Effective Date: 10/05/2004 Expiration Date: No expiration date.
Mod 1 Effective Date: 06/15/2009 Expiration Date: No expiration date.
Mod 2 Effective Date: 10/09/2012 Expiration Date: No expiration date.

Permit Issued To: PACKSTAR GROUP INC
215 JOHN GLENN DR
BUFFALO, NY 14228

Contact: ANDREW C SHARP
PACKSTAR GROUP
215 JOHN GLENN DR
BUFFALO, NY 14228
(716) 853-1688

Facility: PACKSTAR GROUP
215 JOHN GLENN DR
AMHERST, NY 14228

Contact: ANDREW C SHARP
PACKSTAR GROUP
215 JOHN GLENN DR
BUFFALO, NY 14228
(716) 853-1688

Description: Packstar Air State Facility Permit

Packstar located in Amherst, NY produces flexible shrink wrap packaging tubes. The process involves the slitting, seaming (i.e. using tetrahydrofuran as a solvent to weld the edges of the sheet of film stock into a tube) and cutting of tubes to length. The finished product is provided to the customer as either a cut to order cylindrical tube or a roll of cylindrical stock. The tube can then be placed over the product and heat applied to shrink the cylinder around the packaged product. The facility currently operates an 8-color rotogravure press, model HsingWei HWA-1000 and is proposing the addition of a second 12-color rotogravure press Hsing Wei HWA-1200. This modification reflects the addition of the new rotogravure printing press to meet increased production demand and the replacement of the existing regenerative thermal oxidizer with a



fluidized bed concentrator system to control the increase in volatile organic compound (VOC) emissions from both presses.

The presses have ducted drying hoods at each of the color stations which connect to the carbon bed and oxidizer.

The production room where the presses are located meets the definition of permanent total enclosure as demonstrated by Method 204. Therefore, 100% capture of volatile compounds is assumed. Manufacturer's specifications give the destruction efficiency of the control equipment as 95%.

Potential VOC emissions in excess of 370 tons per year will be limited below the major source threshold of 50 tons through federally enforceable permit conditions describing the operation of the Fluid Bed Concentrator which consists of a carbon bed, a desorption chamber for cleaning carbon, and a small thermal oxidizer. The concentrator is comprised of a carbon bed, a desorption chamber for cleaning carbon, and a small thermal oxidizer to control volatile organic compounds from the printing operations. When operated and maintained properly, the control equipment will allow Packstar to maintain VOC emissions below the facility emission limit of 49.9 tons to avoid the requirements of 6NYCRR 201-6, Title V Facility Permits, 6NYCRR 234, Graphic Arts and 6NYCRR 231-2, New Source Review. Total combined hazardous pollutants are also limited to less than the major source threshold of 25 tons.

The oxidizer is required to operate at a minimum of 1200 degrees F and the carbon desorber to operate at a minimum of 300 degrees F.

The facility is subject to no other regulatory requirements than to comply with the terms and conditions of this permit and operate within the federally enforceable emission cap.



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: DOUGLAS E BORSCHEL
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of Applications for Permit Modification or Renewal
 - REGION 9 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

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

Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3:

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



Condition 3: Applications for Permit Renewals and Modifications

Applicable State Requirement: 6 NYCRR 621.13

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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

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

Applicable State Requirement: 6 NYCRR 621.13

Item 1-2.1:

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

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

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

Applicable State Requirement: 6 NYCRR 621.13

Item 2-1.1:

The Department reserves the right to exercise all available authority 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 1-3: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-3.1:

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

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

Condition 4: Permit Modifications, Suspensions and Revocations by the Department

Applicable State Requirement: 6 NYCRR 621.14

Item 4.1:

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

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

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.5 (a)

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits

New York State Department of Environmental Conservation
Facility DEC ID: 9142200428



270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165

Condition 1-4: Submission of application for permit modification or renewal-REGION 9

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 1-4.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

New York State Department of Environmental Conservation

Permit ID: 9-1422-00428/00001

Facility DEC ID: 9142200428



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: PACKSTAR GROUP INC
215 JOHN GLENN DR
BUFFALO, NY 14228

Facility: PACKSTAR GROUP
215 JOHN GLENN DR
AMHERST, NY 14228

Authorized Activity By Standard Industrial Classification Code:
2671 - PAPER COATED AND LAMINATED PACKAGING
2754 - COMMERCIAL PRINTING, GRAVURE

Mod 0 Permit Effective Date: 10/05/2004
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 06/15/2009
date.

Permit Expiration Date: No expiration

Mod 2 Permit Effective Date: 10/09/2012
date.

Permit Expiration Date: No expiration



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 2-1 6 NYCRR 202-1.1: Required Emissions Tests
- 2-2 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *2-3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *2-4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *2-5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *2-6 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *2-7 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 2-8 6 NYCRR 211.1: Compliance Demonstration

Emission Unit Level

- 2-9 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 2 ECL 19-0301: Contaminant List
- 1-2 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 4 6 NYCRR Subpart 201-5: Emission Unit Definition
- 2-10 6 NYCRR 211.1: Air pollution prohibited
- 1-3 6 NYCRR 211.2: Air pollution prohibited
- 2-11 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 7 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 8 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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.

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

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

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

Item E: Emergency Defense - 6 NYCRR 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 F: Recycling and Salvage - 6 NYCRR 201-1.7

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

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

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

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

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

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

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

Item J: Required Emission Tests - 6 NYCRR 202-1.1



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

Item K: Open Fires Prohibitions - 6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 2-1: Required Emissions Tests



Effective between the dates of 10/09/2012 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 2-1.1:

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.

Condition 2-2: Facility Permissible Emissions

Effective between the dates of 10/09/2012 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2-2.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

per year CAS No: 0NY100-00-0 (From Mod 2) PTE: 49,800 pounds

Name: HAP

per year CAS No: 0NY998-00-0 (From Mod 2) PTE: 99,800 pounds

Name: VOC

Condition 2-3: Capping Monitoring Condition

Effective between the dates of 10/09/2012 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2-3.1:

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:

6 NYCRR 201-6.1

6 NYCRR 234.1

Item 2-3.2:

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

Item 2-3.3:

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 2-3.4:

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 2-3.5:

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 2-3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following handling, storage and disposal requirements for VOC containing compounds shall be observed:

(1) all containers used to store or dispose of cloth or paper impregnated with solvents used for surface preparation, cleanup or ink/coating removal shall be covered with a tight fitting lid and kept closed, except momentarily, when adding or removing materials and/or soiled towels;

(2) spent or fresh solvents to be used for surface preparation, cleanup, ink/coating removal or recycling shall be stored in closed containers with tight fitting lids;

(3) open containers shall not be used to store or dispense inks, coatings, solvents, etc. unless production, sampling, maintenance or inspection procedures require operational access. This does not apply to the actual device or equipment designed for the purpose of applying an ink or a coating to a substrate; and

(4) inks, coatings and/or any other VOC containing products or waste shall be stored or disposed of in containers that are kept closed with tight fitting lids.

All employees involved with these activities shall be properly trained in good housekeeping and work practices



that result in the minimization of air pollution and shall be familiar with the requirements of this permit. The facility shall include a certified statement in the annual compliance report indicating that all requirements as specified in this condition have been fulfilled during the calendar year. Any deviations shall be reported. All records of waste disposal shall be kept onsite and made available to Department representatives on request.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 12 calendar month(s).

Condition 2-4: Capping Monitoring Condition
Effective between the dates of 10/09/2012 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2-4.1:

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:

6 NYCRR 201-6.1
6 NYCRR 234.1

Item 2-4.2:

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

Item 2-4.3:

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 2-4.4:

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 2-4.5:

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.



limits, terms, conditions and standards in this permit.

Item 2-5.3:

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 2-5.4:

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 2-5.5:

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 2-5.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The oxidizer temperature is to be maintained at a minimum of 1200 degrees F at all times when the presses are in operation.

To verify compliance with the minimum temperature requirement, the combustion chamber temperature must be continuously monitored and recorded. The continuous temperature recorder shall be installed, operated, calibrated and maintained in accordance with this permit and the manufacturer's recommendations. Original recorder charts and/or electronic data showing continuous monitoring and recording of the combustion chamber operating temperature and records of calibration, maintenance and repair shall be kept onsite. All electronic data shall be stored securely and backed up on a daily basis.



The facility shall include a certified statement in the annual compliance report indicating that all requirements as specified in this condition have been fulfilled during the calendar year. Any deviations shall be reported.

At the discretion of this Department, a stack test may be required to demonstrate the overall efficiency of the control equipment.

Manufacturer Name/Model Number: Baker Furnace Mod SX507
Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1200 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 12 calendar month(s).

Condition 2-6: Capping Monitoring Condition
Effective between the dates of 10/09/2012 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2-6.1:

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:

6 NYCRR Subpart 201-6

Item 2-6.2:

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

Item 2-6.3:

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 2-6.4:

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.

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Item 2-6.5:

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 2-6.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 2-6.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

To avoid the permitting requirements of 6NYCRR 201-6, Title V Facility Permits, actual facility-wide emissions of combined HAPs from all emission sources including exempt, trivial, and fugitive shall be less than 25 tpy as determined by summing the individual monthly HAP emissions during any consecutive 12-month period from all HAP contributing activities. Monthly and 12-month rolling totals of HAPs shall be calculated as described in the capping condition for VOCs specified under 6NYCRR201-7. The recordkeeping and reporting requirements specified under 6NYCRR201-7 also apply to total HAPs.

Parameter Monitored: HAP

Upper Permit Limit: 24.9 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 12-month total, rolled monthly

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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

Condition 2-7: Capping Monitoring Condition

Effective between the dates of 10/09/2012 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2-7.1:

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:

6 NYCRR 201-6.1

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6 NYCRR Subpart 231-2
6 NYCRR 234.1

Item 2-7.2:

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

Item 2-7.3:

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 2-7.4:

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 2-7.5:

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 2-7.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2-7.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Total actual emissions of volatile organic compounds (VOC) from all emission sources including exempt, trivial, and fugitive, shall not exceed 50 tons during any consecutive twelve month period. By accepting this federally enforceable emissions limit, the facility will be established as a synthetic minor source and thereby will not be subject to the major source Title V permitting requirements of 6NYCRR, Part 201-6, the New Source Review Requirements of 6NYCRR, Part 231, or the control requirements for Graphic Arts 6NYCRR, Part 234.



Potential VOC emissions in excess of 370 tons per year will be limited through the use of the Fluid Bed Concentrator which consists of a carbon bed, a desorption chamber for cleaning carbon, and a small thermal oxidizer. This control equipment shall be operated at the established parameters described within this permit.

Each calendar month, the facility-wide 12-month rolling total for VOC emissions shall be determined by adding the current monthly VOC emissions to the VOC emissions for the previous 11 months. It shall be assumed that 100% of the VOCs contained in these products are emitted to the ambient air. VOC emissions are to be calculated using a capture efficiency of 100% as has been demonstrated by Method 204 and a destruction efficiency of 95% (overall control efficiency of 97.5%) will be used. All doors into the press room are to be kept closed during production.

Product data sheets, formulation data or the equivalent are to be used to determine the VOC content of all materials used at the facility. The facility shall keep and maintain accurate records for VOC emitting activities to determine total VOC emissions based on verifiable data.

These records shall include:

- a current list of all VOC containing products used for activities throughout the facility with current information on the manufacturer and product name/code, VOC content, vapor pressure and other pertinent data;
- a monthly log of the consumption of any product containing VOCs used throughout the facility;
- any other information that supports the monthly log, such as purchase orders, invoices, equipment operation, maintenance and repair logs/records, production records, metering logs, and continuous temperature recordings for the thermal oxidizer and carbon bed adsorber.
- all calculations used to determine the monthly emissions; and
- information, such as make, model, maximum design process rate or throughput, etc. on equipment, including control equipment, used in any prepress, press and postpress operation which emit VOCs.

The total VOCs contained in waste sent offsite may be subtracted from the total facility VOC emissions calculated from purchase/usage records, as described above only if the VOC content of the waste has been determined by an unaffiliated lab or waste disposal facility and can be verified by RCRA waste disposal records for this facility. Copies of the RCRA reports, analyses and any



other supporting documentation that are used to determine facility totals shall be kept on-site.

When an MSDS or Product Data Sheet shows a range for chemical content, the maximum content shall be used to determine emissions.

All incidents of by-pass of the thermal oxidizer are to be recorded and the uncontrolled VOC emissions calculated (assumed to be 100%) and included in the twelve month rolling totals. By-pass dates are to be reported in the annual compliance report.

The owner or operator of any facility which uses air pollution control equipment to comply with an emissions cap, standard, limit or any other requirement must operate and maintain such equipment in a manner consistent with good engineering practices.

Annual compliance reports must be submitted to this office by January 31 for the previous calendar year summarizing total VOC emissions for each consecutive 12 month period of the reporting year. All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported.

Noncompliance with the rolling twelve month total must be reported immediately on discovery.

All records are to be maintained on-site in a format easily accessible and made available to Department representatives on request.

At the discretion of this Department, a stack test may be required to demonstrate the overall efficiency of the control equipment.

Parameter Monitored: VOC
Upper Permit Limit: 49.9 tons per year
Reference Test Method: Method 25/25A
Monitoring Frequency: MONTHLY
Averaging Method: 12-month total, rolled monthly
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 12 calendar month(s).

Condition 2-8: Compliance Demonstration
Effective between the dates of 10/09/2012 and Permit Expiration Date



Applicable Federal Requirement:6 NYCRR 211.1

Item 2-8.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Openings to the outside of the building near VOC generating activities and doors into the press room shall not be left open for extended periods of time. Activities that necessitate opening doors include maintenance and other activities required for business. Doors shall be open only the minimum time required to complete a task and shall be closed immediately upon completion or during periods of inactivity while conducting the task. The negative pressure system has been verified by a velometer and meets the criteria of Method 204 for permanent total enclosure.

The facility shall make additional changes to their operations to reduce emissions and/or mitigate odors, if necessary. Any complaints received regarding odors caused by the facility or associated operations shall be recorded in a permanently bound logbook and reported to the NYSDEC within 2 calendar days of occurrence. The cause of the problem shall be investigated and corrective action taken immediately. Details shall be provided to the NYSDEC in a written report within 30 days of the complaint. Packstar shall include a certified statement in the Annual Compliance Certification Report indicating that all requirements as specified in this condition have been fulfilled during the calendar year. Any deviations shall be reported.

All records shall be maintained onsite for 5 years and shall be readily available upon request by the NYSDEC and/or USEPA.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

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



**** Emission Unit Level ****

Condition 2-9: Emission Unit Permissible Emissions
Effective between the dates of 10/09/2012 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2-9.1:

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

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

Emission Unit: 0-0EU01

CAS No: 0NY998000 (From Mod 2)

Name: VOC

PTE(s): 99,800 pounds per year

183 pounds per hour



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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 2: Contaminant List
Effective between the dates of 10/05/2004 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 2.1:

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

CAS No: 0NY100-00-0
Name: HAP

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

Condition 1-2: Unavoidable noncompliance and violations
Effective between the dates of 06/15/2009 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-2.1:

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

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

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



above.

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

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

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

**Condition 4: Emission Unit Definition
Effective between the dates of 10/05/2004 and Permit Expiration Date**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 4.1(From Mod 2):

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

Emission Unit: 0-0EU01

Emission Unit Description:

This emission unit comprises two processes, P01-Printing and associated ink/solvent storage room and P02-seam sealing. Printing operations include (ES01) is an 8-color rotogravure press manufactured by HSING WEI, model number HWA-1000 and a 12-color rotogravure press, Hsing Weii HWA-1200. Both presses have ducted drying hoods at each of the color stations which direct volatile organic compound (VOC) emissions to a fluidized carbon adsorption bed (emission point EP003) which is followed by a thermal oxidizer (TO) (emission point EP004). Both the TO and the carbon bed can be by-passed through a common exhaust emission point EP001.

A desorption chamber is utilized to clean the carbon.

Fugitive emissions of VOC's are emitted through an air exchange unit in the printing room and from the adjacent ink/solvent drum storage room.

Seam sealing operations P02- involve sealing two or more layers of plastic material using solvent.

Building(s): 001

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Emission Point: EP001
Height (ft.): 20 Diameter (in.): 52
NYTMN (km.): 4770.938 NYTME (km.): 189.753 Building: 001

Emission Point: EP003
Height (ft.): 20 Diameter (in.): 19
NYTMN (km.): 4770.953 NYTME (km.): 189.737 Building: 001

Emission Point: EP004
Height (ft.): 20 Diameter (in.): 30
NYTMN (km.): 4770.953 NYTME (km.): 189.737 Building: 001

Condition 8: Process Definition By Emission Unit
Effective between the dates of 10/05/2004 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 8.1(From Mod 2):

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

Emission Unit: 0-0EU01
Process: P01 Source Classification Code: 4-05-005-12

Process Description:

Rotogravure printing. The 8-station press will operate at an average speed of 100 meters/minute and a web width of 0.5 meters. The 12-station press will operate at an average speed of 150 meters/minute and a web width of 0.5 meters.

Volatile organic compound (VOC) emissions from both presses are exhausted through a fluidized bed concentrator which comprises a carbon bed, desorption chamber to clean carbon, followed by a small thermal oxidizer.

Emission Source/Control: 0ES04 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 0ES05 - Control
Control Type: FLUID BED DRY SCRUBBER

Emission Source/Control: 0ES01 - Process

Emission Source/Control: 0ES02 - Process

Item 8.2(From Mod 2):

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

Emission Unit: 0-0EU01
Process: P02 Source Classification Code: 3-08-010-03

Process Description:

This process identifies several stations where packaging film is cut and sealed using Tetrahydrofuran as a solvent

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to weld the edges of the sheet of film stock into a tube.
Volatile organic compounds are released as fugitives.

Emission Source/Control: 0ES03 - Process

Item 8.3(From Mod 2):

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

Emission Unit: 0-0EU01

Process: P03

Source Classification Code: 4-05-005-12

Process Description:

By-pass of control system during control system
malfunction. Emissions will be directed to emission point
EP001.

Emission Source/Control: 0ES06 - Process

