

**New York State Department of Environmental Conservation
Facility DEC ID: 9143000110**



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

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1430-00110/00021
Effective Date: 11/14/2006 Expiration Date: 11/13/2011

Permit Issued To: CELLO-PACK CORP
55 INNSBRUCK DRIVE
BUFFALO, NY 14227

Facility: CELLO-PACK CORPORATION OF BUFFALO
55 INNSBRUCK DR
CHEEKTOWAGA, NY 14227

Contact: FRANCISCO CAVALCANTI
CELLO-PACK CORP OF BUFFALO
55 INNSBRUCK DR
BUFFALO, NY 14227
(716) 668-3111

Description:

Cello-Pack Corporation is a commercial flexographic printing facility located in the Town of Cheektowaga, Erie County, New York. Cello-Pack designs, prints, and converts flexible packaging materials used in food, medical, industrial, and personal care/hygiene consumer products. The facility operates and maintains flexographic printing presses used to print packaging products on various substrates including polyethylene, polypropylene, cellophane, nylon, and polyester.

Cello-Pack is subject to the Title V permitting requirements stated in 6NYCRR Part 201-6 for major facilities. This Title V permit is a renewal of the permit issued in 2001, and incorporates a permit modification application dated March 23, 2006. Cello-Pack intends to modify the facility by removing three existing presses (00P01, 00P04, and 00P05) and installing one new press, 00P09.

The facility is organized into two emission units identified as 1-CORNA and 1-PRESS. Emission unit 1-CORNA consists of one corona discharge surface treater used to cure the inks onto various substrates. The corona treater generates ozone which, in turn, is controlled by a catalytic ozone decomposer. The emissions from the surface treaters are subject to 6NYCRR Part 212, Table 2 where the degree of air cleaning required is specified by the Department. The control efficiency of the ozone decomposer, as per the manufacturer's guarantee, is 99.9% which satisfies the requirements of 6NYCRR Part 212.

After the facility is modified by removing three existing presses and installing one new press as provided for in the above-mentioned permit modification application, emission unit 1-PRESS will consist of three wide-web flexographic printing presses, five discharge surface treaters, and three dryers. Cello-Pack operates and maintains a catalytic oxidizer to reduce and control the volatile organic compound (VOC)



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emissions from the flexographic printing presses and the ozone from the discharge surface treaters associated with this emission unit.

In accordance with 6NYCRR Part 231-2 New Source Review, Cello-Pack calculated the facility's current Maximum Annual Potential per 6NYCRR Part 231-2.1(b)(22) to be 187 tons per year (tpy) of VOC. The facility will limit potential VOC emissions from the entire facility to less than 187 tpy after the above-mentioned equipment modifications for purposes of capping out of the source project requirements of 6NYCRR Part 231-2.

The 187 tpy VOC emission cap includes two separate, previously accepted VOC emission caps for the other two existing presses, 00P07 and 00P08. Each press was previously permitted with a 39 tpy VOC emission cap in order to fall below the significant net emission increase threshold of 40 tpy per 6 NYCRR Part 231-2. Each of these 39 tpy caps will remain in force within the total facility VOC cap of 187 tpy.

The actual VOC emissions shall be calculated based on the usage of ink, varnish, adhesive, solvent, and other VOC containing products; the VOC content of the products; and an overall VOC capture and destruction efficiency as determined by actual source testing, catalyst analysis, or via manufacturer's guarantees as approved by the Department. Cello-Pack will not exceed an emission rate of 187 tons of VOCs per 12 month period for the facility. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period.

Cello-Pack is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), since the facility has potential pre-control device VOC emissions greater than 50 tons per year, which is the major source threshold level, and a control device is used to achieve compliance with an emission standard. This rule required Cello-Pack to submit a CAM Plan which detailed and justified the monitoring indicators and performance criteria used at the facility to assure proper operation of the control device.

The VOC emissions from the printing operations are subject to the Reasonably Available Control Technology (RACT) provisions specified in 6NYCRR Part 234. In accordance with 6NYCRR Part 234, Cello-Pack is required to operate the flexographic printing process such that the capture system and the air cleaning devices provide for an overall reduction in VOC emissions of at least 60%. Cello-Pack is required to conduct performance testing of the presses (to determine capture efficiency) and the oxidizer (to determine destruction efficiency) within 180 days of permit issuance, and once every permit term, to assure compliance with the 60% overall VOC reduction requirement.

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 S DENK
 DIVISION OF ENVIRONMENTAL PERMITS
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Applications for permit renewals, modifications and transfers

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



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 and Modifications
Applicable State Requirement: 6NYCRR 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:



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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, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

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 Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.5(a)

Item 7.1:

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 14203-2999
(716) 851-7165



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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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55 INNSBRUCK DRIVE
BUFFALO, NY 14227

Facility: CELLO-PACK CORPORATION OF BUFFALO
55 INNSBRUCK DR
CHEEKTOWAGA, NY 14227

Authorized Activity By Standard Industrial Classification Code:
2396 - AUTOMOTIVE & APPAREL TRIMMINGS
2741 - MISCELLANEOUS PUBLISHING

Permit Effective Date: 11/14/2006

Permit Expiration Date: 11/13/2011



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 200.3: False statement
- 24 6NYCRR 201-6: Emission Unit Definition
- 25 6NYCRR 201-6.5(c)(3): Compliance Certification
- 26 6NYCRR 201-6.5(g): Non Applicable requirements
- 27 6NYCRR 201-7.1: Facility Permissible Emissions
- *28 6NYCRR 201-7.1: Capping Monitoring Condition
- 30 40CFR 63.820(a)(2), Subpart KK: Compliance Certification
- 31 40CFR 63.829(d), Subpart KK: Compliance Certification
- 29 40CFR 63.830(b)(1), Subpart KK: Compliance Certification
- 32 40CFR 64: Compliance Certification

Emission Unit Level

- 33 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 34 6NYCRR 201-6: Process Definition By Emission Unit

EU=1-CORNA,Proc=002

- 35 6NYCRR 212.9(b): Compliance Certification

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EU=1-PRESS,Proc=001

- 36 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 37 6NYCRR 234.3(a)(3)(iii): Compliance Certification
- 38 6NYCRR 234.3(a)(3)(iv): control requirements
- 39 6NYCRR 234.3(e): control requirement
- 40 6NYCRR 234.4(a)(2): Compliance Certification
- 41 6NYCRR 234.4(b)(3): Compliance Certification
- 42 6NYCRR 234.4(b)(4): sampling
- 43 6NYCRR 234.4(c)(2): Compliance Certification
- 44 6NYCRR 234.4(c)(2): Compliance Certification
- 45 6NYCRR 234.6: Compliance Certification

EU=1-PRESS,Proc=001,ES=00P01

- 46 6NYCRR 231-2: Compliance Certification

EU=1-PRESS,Proc=001,ES=00P04

- 47 6NYCRR 231-2: Compliance Certification

EU=1-PRESS,Proc=001,ES=00P07

- *48 6NYCRR 201-7.1: Capping Monitoring Condition

EU=1-PRESS,Proc=001,ES=00P08

- *49 6NYCRR 201-7.1: Capping Monitoring Condition

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 50 ECL 19-0301: Contaminant List
- 51 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 52 6NYCRR 211.2: Air pollution prohibited

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 11/14/2006 and 11/13/2011

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 11/14/2006 and 11/13/2011

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 11/14/2006 and 11/13/2011

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 11/14/2006 and 11/13/2011

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 11/14/2006 and 11/13/2011

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

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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 any of the above conditions are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) through (4) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraph (1) through (4) of this section must also be identified in the 6 month monitoring report required above.

If the permittee seeks to have a violation excused as provided in 201-1.4, the permittee shall report such violations as required under 201-1.4(b). However, in no case may reports of any deviation be on a less frequent basis than those described in paragraphs (1) through (4) above. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

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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 Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

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:

Compliance certifications shall contain the following information:

- the identification of each term or condition of the

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permit that is the basis of the certification;

- the compliance status;
- whether compliance was continuous or intermittent;
- the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
- such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;

and

- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

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

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

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

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring
and Enforcement
50 Wolf Road
Albany, NY 12233-3258

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Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

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 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:

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

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

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

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

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 215

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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 11/14/2006 and 11/13/2011

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 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:

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

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:

No person shall 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.



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Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 11/14/2006 and 11/13/2011

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 11/14/2006 and 11/13/2011

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 11/14/2006 and 11/13/2011

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 11/14/2006 and 11/13/2011

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



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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 11/14/2006 and 11/13/2011

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

Item 17.1:

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

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 11/14/2006 and 11/13/2011

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



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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 11/14/2006 and 11/13/2011

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 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 211.3

Item 20.1:

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

Condition 21: Accidental release provisions.
Effective between the dates of 11/14/2006 and 11/13/2011

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:

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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 11/14/2006 and 11/13/2011

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: False statement
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 200.3

Item 23.1:

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 24: Emission Unit Definition
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 201-6

Item 24.1:

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

Emission Unit: 1-CORNA

Emission Unit Description:

Emission unit 1-CORNA consists of one (1) corona



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discharge surface treater used for films such as polyethylene, polypropylene, cellophane, nylon, and polyester. The unit is used on the water-based laminator. The Corona treater (CDST3) generates ozone, which is controlled by a catalytic decomposer (COD03).

Building(s): MAIN

Item 24.2:

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

Emission Unit: 1-PRESS

Emission Unit Description:

Emission Unit 1-PRESS consists of three (3) flexographic printing presses (00P07, 00P08, and 00P09), five discharge surface treaters (CDST4, CDST5, CDST7, CDST8 and CDST9), and 3 dryers (DRYER). CDST4 and CDST5 are associated with a solventless laminator. CDST7 is associated with emission source 00P07, CDST8 is associated with emission source 00P08, and CDST9 is associated with emission source 00P09.

Building(s): MAIN

Condition 25: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

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

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year 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.

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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 Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 26: Non Applicable requirements
Effective between the dates of 11/14/2006 and 11/13/2011

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

Item 26.1:

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.

Condition 27: Facility Permissible Emissions
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 201-7.1



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Item 27.1:

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

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

CAS No: 0NY998-00-0

PTE: 374,000 pounds per year

Name: VOC

Condition 28: Capping Monitoring Condition

Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 28.1:

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

6NYCRR 231-2

Item 28.2:

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

Item 28.3:

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

Item 28.4:

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

Item 28.5:

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

Item 28.6:

The Compliance Certification activity will be performed for the Facility.



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Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 28.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Cello-Pack Corporation (CPC) submitted a permit modification application dated March 23, 2006. CPC intends to modify the facility by removing three existing presses (00P01, 00P04, and 00P05) and installing one new press, 00P09. In accordance with 6NYCRR Part 231-2 New Source Review, CPC calculated the facility's current Maximum Annual Potential per 6NYCRR Part 231-2.1(b)(22) to be 187 tons per year (tpy) of volatile organic compounds (VOC). The facility will limit potential VOC emissions from the entire facility to less than 187 tpy after the equipment modifications for purposes of capping out of the source project requirements of 6NYCRR Part 231-2.

The 187 tpy VOC emission cap includes two separate, previously accepted VOC emission caps for two existing presses, 00P07 and 00P08. Each press was previously permitted with a 39 tpy VOC emission cap in order to fall below the significant net emission increase threshold of 40 tpy per 6 NYCRR Part 231-2. Each of these 39 tpy caps will remain in force within the total facility VOC cap of 187 tpy, and are described within Permit Conditions #48 & 49.

The actual VOC emissions shall be calculated based on the usage of ink, varnish, adhesive, solvent, and other VOC containing products; the VOC content of the products; and an overall VOC capture and destruction efficiency as determined by actual source testing, catalyst analysis, or via manufacturer's guarantees as approved by the Department. The general accuracy of the emission calculations shall be verified by maintaining pertinent records including, but not limited to: purchase and/or production records, VOC content of products, and hours of operation. All records with corresponding emission calculations shall be kept on-site for a minimum of five years. This information shall be made available to the Department on request.

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CPC will not exceed an emission rate of 187 tons of VOCs per 12 month period for the facility. Compliance will be determined by summing the individual monthly emissions during any consecutive 12 month period using the following formula:

$$\text{VOC}(\text{facility}) = [\text{VOC}(00\text{P}07) \times (1 - \text{CDE})] + [\text{VOC}(00\text{P}08) \times (1 - \text{CDE})] + [\text{VOC}(00\text{P}09) \times (1 - \text{CDE})] + \text{VOC}(\text{down time}) + \text{VOC}(\text{fugitive})$$

where,

VOC(00P07) = VOC emissions generated by Press 7, designated emission source 00P07.

VOC(00P08) = VOC emissions generated by Press 8, designated emission source 00P08.

VOC(00P09) = VOC emissions generated by Press 9, designated emission source 00P09.

CDE = overall capture and destruction efficiency of oxidizer system (designated emission source/control device COX03) as measured during performance testing, or the manufacturer guaranteed value until the performance testing required in Permit Condition #40 can be completed.

- The manufacturer guaranteed value for Press 7 is 90%, which is the product of a 92% capture efficiency and a 98% destruction efficiency.

- The manufacturer guaranteed value for Press 8 is 83%, which is the product of a 85% capture efficiency and a 98% destruction efficiency.

- The manufacturer guaranteed value for Press 9 is 90%, which is the product of a 92% capture efficiency and a 98% destruction efficiency.

Destruction efficiency results will be updated annually via the catalyst analysis required in Permit Condition #37. The most recent test results will be used in emission calculations.

VOC(down time) = unoxidized VOC emissions released to the environment during oxidizer down times.

VOC(fugitive) = estimated VOC losses that are released to the environment through the facility's ventilation system.



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The facility shall submit to the Department an annual emission cap report for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each rolling 12-month period throughout the calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 187 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 30: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

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

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 30.2:

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



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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 1/30/2007.

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

Condition 31: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 40CFR 63.829(d), Subpart KK

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each facility which commits to the criteria of 40CFR63.820(a)(2) for the purpose of capping his or her facility out of 40CFR63 Subpart KK shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria.

These records shall be kept on a monthly basis, and shall include the mass of all HAP-containing materials used during the month, and the mass fraction of HAP present in each HAP-containing material used.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 29: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011



Applicable Federal Requirement: 40CFR 63.830(b)(1), Subpart KK

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to this subpart shall submit the reports specified below to the Administrator:

(1) An initial notification required in Sec. 63.9(b).

(i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in Sec. 63.826(a).

(ii) Initial notifications for new and reconstructed sources shall be submitted as required by Sec. 63.9(b).

(iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under Sec. 63.9(b), provided the same information is contained in the permit application as required by Sec. 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(iv) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 32: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 40CFR 64



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Item 32.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Cello-Pack Corporation is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) since the facility has potential pre-control device VOC emissions greater than 50 tons per year, which is the major source threshold level, and a control device is used to achieve compliance with an emission standard. This rule required Cello-Pack to submit a CAM Plan which detailed and justified the monitoring indicators and performance criteria used at the facility to assure proper operation of the control device.

The CAM Plan, dated August, 2006, was prepared by Benchmark Environmental Engineering & Science, PLLC for Cello-Pack. The plan was submitted to the Department and approved via the issuance of this permit. The plan has been incorporated into the permit via monitoring Permit Conditions #37, 40, 41, 43, & 44.

Cello-Pack is required to maintain and operate all monitoring equipment at all times while printing is occurring. If either Cello-Pack or the Department determines that there is a need for an improved monitoring plan, Cello-Pack may be required to develop a Quality Improvement Plan (QIP) per 40CFR Part 64.8.

In addition to the semi-annual reporting requirements of 6NYCRR Part 201-6.5(c)(3)(ii), 201-6.5(c)(3), and 201-6.5(e) in Permit Conditions #5, 25 & 6, respectively, Cello-Pack must, to satisfy the reporting requirements of 40CFR Part 64.9, include information with those semi-annual reports which summarizes:

1. the number, duration, and cause of exceedances; and corrective actions taken;
2. the number, duration and cause for monitor downtime incidents; and



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3. description of the actions taken to implement a QIP during the reporting period, 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 1/30/2007.

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

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

Condition 33: Emission Point Definition By Emission Unit
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 201-6

Item 33.1:

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

Emission Unit: 1-CORNA

Emission Point: 00600

Height (ft.): 22

Diameter (in.): 8

NYTMN (km.): 4753.12

NYTME (km.): 194.129

Item 33.2:

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

Emission Unit: 1-PRESS

Emission Point: 01000

Height (ft.): 28

Diameter (in.): 40

Building: MAIN

Condition 34: Process Definition By Emission Unit
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 201-6

Item 34.1:

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

Emission Unit: 1-CORNA

Process: 002

Source Classification Code: 4-05-005-97



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Process Description:

Process 002 consists of surface treating films such as polyethylene, polypropylene, cellophane, nylon, and polyester with a Corona discharge surface treater. The emissions consist of ozone only, and are controlled by a catalytic ozone decomposer.

Emission Source/Control: COD03 - Control

Control Type: CATALYTIC REDUCTION

Emission Source/Control: CDST3 - Process

Item 34.2:

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

Emission Unit: 1-PRESS

Process: 001

Source Classification Code: 4-05-003-01

Process Description:

Process 001 consists of packaging flexographic printing operations using three (3) printing presses (00P07, 00P08, and 00P09) and three dryers (DRYER). Emissions from each press and dryer are captured and controlled by a single catalytic oxidizer (COX03). Two additional printing presses (00P01 and 00P04) are in the process of being decommissioned in conjunction with the installation of the new press, 00P09.

Emission Source/Control: COX03 - Control

Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: 00P01 - Process

Emission Source/Control: 00P04 - Process

Emission Source/Control: 00P07 - Process

Emission Source/Control: 00P08 - Process

Emission Source/Control: 00P09 - Process

Emission Source/Control: DRYER - Process

Design Capacity: 2.75 million Btu per hour

Item 34.3:

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

Emission Unit: 1-PRESS

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Process: 004

Source Classification Code: 4-05-005-97

Process Description:

Process 004 consists of five surface treaters (CDST4, CDST5, CDST7, CDST8, and CDST9) used on films such as polyethylene, polypropylene, cellophane, nylon and polyester. The ozone emissions from the corona surface treaters are controlled by the catalytic oxidizer (COX03).

Emission Source/Control: COX03 - Control
Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: CDST4 - Process

Emission Source/Control: CDST5 - Process

Emission Source/Control: CDST7 - Process

Emission Source/Control: CDST8 - Process

Emission Source/Control: CDST9 - Process

Condition 35: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 212.9(b)

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-CORNA
Process: 002

Regulated Contaminant(s):
CAS No: 010028-15-6 OZONE

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

As per the emission calculations submitted by Cello-Pack, the manufacture of the ozone decomposers guarantees to have a maximum of 0.1 parts per million (ppm) ozone. Cello-Pack is required to complete the manufacturer recommended maintenance on the ozone decomposers to ensure proper operation of the units. The maintenance activities



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must be documented, maintained on-site, and available for review by the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 36: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

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

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS

Process: 001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 36.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

As specified in 6NYCRR Part 234.3(a)(3)(iii), where a flexographic printing process is employed, the capture system and the air cleaning device must provide for an overall reduction in volatile organic compound (VOC) emissions of at least 60 percent. The overall removal efficiency consists of two components and is calculated as the product of the capture efficiency of the gas collection system and the destruction efficiency of the control equipment.

Initial compliance with this requirement will be demonstrated during performance testing as detailed in Permit Condition #40. Continuous compliance with the 60% overall removal efficiency will be assured by: (1) maintaining the capture efficiency of the gas collection system as outlined below, and (2) maintaining the destruction efficiency of the catalytic oxidizer as

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outlined in Permit Condition #37.

A capture system, such as covers, vents, hoods and a totally enclosed central impression drum, is used to contain the VOC emissions and direct them to the control device. A decrease in the capture efficiency of the gas collection system results in uncaptured or fugitive emissions. The hoods and other VOC pick-up points for the presses at Cello-Pack were designed to control the quality and speed of the operations. By design, this proper balancing of the system results in a high capture efficiency.

As such, Cello-Pack Corporation is required to properly maintain and operate the gas collection system for the volatile organic compound (VOC) emissions from the flexographic presses to ensure the capture efficiency of the collection system is maintained.

Parameter Monitored: VOC

Lower Permit Limit: 60.0 percent reduction by weight

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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 1/30/2007.

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

Condition 37: Compliance Certification

Effective between the dates of 11/14/2006 and 11/13/2011

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

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS

Process: 001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 37.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Cello-Pack Corporation is required to properly maintain and operate the catalytic oxidizer to ensure the destruction efficiency of the unit is maintained. This shall be accomplished by completing the regularly scheduled maintenance activities as specified in the manufacturer's maintenance manual. The maintenance activities shall be documented in the maintenance file through the use of purchase orders and other similar work agreements.

In addition, Cello-Pack is required to monitor the integrity of the catalyst by completing the following two activities on an annual basis:

- (1) Sample and analyze the catalyst, as per the manufacturer recommendations, to determine the condition of the catalyst. Replace the catalyst as necessary; and
- (2) Check the depth of the catalyst bed to ensure the proper depth is present. Replenish the depth of the bed as necessary.

Records of the laboratory test results of the catalyst shall be kept on-site and be made available for review upon request by the Department.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 38: control requirements

Effective between the dates of 11/14/2006 and 11/13/2011

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

Item 38.1:

This Condition applies to Emission Unit: 1-PRESS
Process: 001

Item 38.2:

The overall removal efficiency is determined by testing the capture efficiency and the removal efficiency



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of the control equipment, utilizing test methods acceptable to the commissioner.

Condition 39: control requirement
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 234.3(e)

Item 39.1:

This Condition applies to Emission Unit: 1-PRESS
Process: 001

Item 39.2:

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 6 NYCRR Part 234.

Condition 40: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

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

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS
Process: 001

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

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Cello-Pack must assure compliance with the minimum overall VOC removal efficiency rate of 60% for the capture and control devices. The overall VOC removal efficiency is the product of the capture efficiency of the gas collection system and the destruction efficiency of the oxidizer.

The overall VOC removal efficiency must be verified no later than 180 days after the date of permit issuance via performance testing in accordance with 40CFR60, Appendix A, Method 204. The performance test determining the destruction efficiency of the oxidizer must be performed,



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in accordance with 40CFR60, Appendix A, Method 18, 25 or 25A, once every five years, based on the date of the previous test. The capture efficiency testing of the presses need only be repeated if physical changes to the air distribution system occur. Physical changes to the air distribution system include, but are not limited to, adding print stations to a press, increasing or decreasing the volumetric flow rate from the dryer (e.g., by changing the size of press fans/motors or removal or derating of dryers), and changing the static duct pressure.

Test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

Lower Permit Limit: 60 percent reduction by weight
Reference Test Method: EPA Method 18, 25, 25A, 204
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

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

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS
Process: 001

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

Item 41.2:

Compliance Certification shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

Upon written request from the Department, Cello-Pack shall report or make available monthly recordkeeping to demonstrate compliance.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

Condition 42: sampling

Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 234.4(b)(4)

Item 42.1:

This Condition applies to Emission Unit: 1-PRESS
Process: 001

Item 42.2:



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The results of any analysis or other procedure used for establishing compliance must be provided to the commissioner's representative. Representatives of the department shall be permitted, during reasonable business hours, to obtain ink and/or fountain solution samples for the purpose of determining compliance with 6NYCRR Part 234.

Condition 43: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

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

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS

Process: 001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 43.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Cello-Pack will assure that all VOC-laden gas streams from operating presses will be routed to a properly operating oxidizer. This is accomplished by the interlocked oxidizer and presses system, which only allows operation of a press if the catalyst bed temperature is at least 600 degrees F. This assures that a VOC-laden gas stream from a press in printing mode can not pass through an insufficiently warmed oxidizer which would be incapable of a sufficient destruction efficiency.

Cello-Pack will continuously monitor the temperature of the inlet gas stream to the oxidizer. The temperature will be maintained at or above 580 degrees F to assure the minimum destruction efficiency based on catalyst analyses.

Continuous monitors to measure the temperature at the inlet and outlet of the catalytic incinerator bed must be installed, periodically calibrated, and operated at all times the associated control equipment is operating. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. Cello-Pack



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shall maintain continuous recording charts of the bed temperatures. The continuous chart recordings and the calibration data shall be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 580 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT
DURING STARTUP/SHUTDOWN
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 44: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

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

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS
Process: 001

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

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Cello-Pack will monitor on a weekly basis the inlet and outlet oxidizer temperatures, while at least one press is actively printing, to confirm that a temperature rise across the catalyst bed is occurring. This will assure that the catalyst is destroying VOC's.

These observations will be recorded in a log at the facility and shall be made available for inspection by Department representatives upon request. Records will be maintained for a period of at least five years.



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Monitoring Frequency: WEEKLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 45: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 234.6

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS
Process: 001

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

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No owner or operator of a facility subject to 6NYCRR Part 234 shall:

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

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As specified in 6NYCRR Part 201-6.5(c)(3), Cello-Pack is required to include a statement in the semiannual report whether the monitoring and/or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 46: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 231-2

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS
Process: 001 Emission Source: 00P01

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

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Press 1, identified as emission source 00P01, will be removed from service prior to the commencement of operation of Press 9, identified as emission source 00P09.

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 1/30/2007.

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

Condition 47: Compliance Certification
Effective between the dates of 11/14/2006 and 11/13/2011

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Applicable Federal Requirement: 6NYCRR 231-2

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS

Process: 001

Emission Source: 00P04

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Press 4, identified as emission source 00P04, shall not be operated after December 31, 2006, except under either of the following conditions:

1. To demonstrate the press for a potential buyer.
2. To run if Press 9 is not operational due to installation or debugging issue.

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 1/30/2007.

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

Condition 48: Capping Monitoring Condition

Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 48.1:

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 48.2:

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



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Item 48.3:

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 48.4:

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 48.5:

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 48.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS
Process: 001 Emission Source: 00P07

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

Item 48.7:

Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In accordance with 6NYCRR Part 231-2, a New Source Review analysis was completed when the original Title V permit for the facility was modified in April, 2002. The permit modification included the addition of Press 7, emission source 00P07. The results indicated the potential volatile organic compounds (VOC) emissions from the proposed modification may exceed the significant net emission increase of 40 tons per year (tpy), whereas the actual emissions are estimated to be less than 18 tpy. As such, Cello-Pack (CPC) accepted a limit of 39 tpy on the emissions from the new Press 7.

CPC will not exceed an emission rate of 39 tons of VOCs

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per 12 month period for Press 7. Compliance will be determined on an annual maximum rolled monthly basis using the following formula:

$$\text{VOC} = [\text{VOC}(00\text{P}07) \times (1-\text{CDE})] + \text{VOC}(\text{down time}) + \text{VOC}(\text{fugitive})$$

where,

$\text{VOC}(00\text{P}07) =$ VOC emissions generated by Press 7.

CDE = overall capture and destruction efficiency of oxidizer system (designated emission source/control device COX03) as measured during performance testing, or the manufacturer guaranteed value until the performance testing required in Permit Condition #40 can be completed.

- The manufacturer guaranteed value for Press 7 is 90%, which is the product of a 92% capture efficiency and a 98% destruction efficiency.

Destruction efficiency results will be updated annually via the catalyst analysis required in Permit Condition #37. The most recent test results will be used in emission calculations.

$\text{VOC} =$ total VOC emissions generated by Press 7 which were released to the environment.

$\text{VOC}(\text{down time}) =$ unoxidized VOC emissions released to the environment during oxidizer down times.

$\text{VOC}(\text{fugitive}) =$ estimated VOC losses that are released to the environment through the facility's ventilation system.

The actual annual VOC emissions shall be calculated based on the usage of ink, varnish, adhesive, solvent, and any other VOC containing products; the VOC content of the products; and an overall VOC capture and destruction efficiency as determined by actual source testing or using manufacturer guarantees as approved by the Department.

The general accuracy of the emission calculations shall be verified by maintaining pertinent records including, but not limited to: purchase and/or production records, VOC content of products, and hours of operation.



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All records with corresponding emission calculations shall be kept on-site for a minimum of five years. This information shall be made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: VOLATILE FRACTION OF INK
Parameter Monitored: VOC
Upper Permit Limit: 39 tons per year
Monitoring Frequency: ANNUALLY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 49: Capping Monitoring Condition
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 49.1:

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 49.2:

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

Item 49.3:

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 49.4:

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

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threshold levels that would require compliance with an applicable requirement.

Item 49.5:

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 49.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PRESS

Process: 001

Emission Source: 00P08

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 49.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In accordance with 6NYCRR Part 231-2, a New Source Review analysis was completed when the original Title V permit for the facility was modified in April, 2002. The permit modification included the addition of Press 8, emission source 00P08. The results indicated the potential volatile organic compounds (VOC) emissions from the proposed modification may exceed the significant net emission increase of 40 tons per year (tpy), whereas the actual emissions are estimated to be less than 18 tpy. As such, Cello-Pack (CPC) accepted a limit of 39 tpy on the emissions from the new Press 8.

CPC will not exceed an emission rate of 39 tons of VOCs per 12 month period for Press 8. Compliance will be determined on an annual maximum rolled monthly basis using the following formula:

$$\text{VOC} = [\text{VOC}(00\text{P}08) \times (1 - \text{CDE})] + \text{VOC}(\text{down time}) + \text{VOC}(\text{fugitive})$$

where,

$\text{VOC}(00\text{P}08) =$ VOC emissions generated by Press 8.

$\text{CDE} =$ overall capture and destruction efficiency of



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oxidizer system (designated emission source/control device COX03) as measured during performance testing, or the manufacturer guaranteed value until the performance testing required in Permit Condition #40 can be completed.

- The manufacturer guaranteed value for Press 8 is 83%, which is the product of a 85% capture efficiency and a 98% destruction efficiency.

Destruction efficiency results will be updated annually via the catalyst analysis required in Permit Condition #37. The most recent test results will be used in emission calculations.

VOC = total VOC emissions generated by Press 8 which were released to the environment.

VOC(down time) = unoxidized VOC emissions released to the environment during oxidizer down times.

VOC(fugitive) = estimated VOC losses that are released to the environment through the facility's ventilation system.

The actual annual VOC emissions shall be calculated based on the usage of ink, varnish, adhesive, solvent, and any other VOC containing products; the VOC content of the products; and an overall VOC capture and destruction efficiency as determined by actual source testing or using manufacturer guarantees as approved by the Department.

The general accuracy of the emission calculations shall be verified by maintaining pertinent records including, but not limited to: purchase and/or production records, VOC content of products, and hours of operation.

All records with corresponding emission calculations shall be kept on-site for a minimum of five years. This information shall be made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: VOLATILE FRACTION OF INK

Parameter Monitored: VOC

Upper Permit Limit: 39 tons per year

Monitoring Frequency: ANNUALLY

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Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -

SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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 50: Contaminant List
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable State Requirement: ECL 19-0301

Item 50.1:

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: 010028-15-6

Name: OZONE

CAS No: 0NY998-00-0

Name: VOC

Condition 51: Unavoidable noncompliance and violations
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable State Requirement: 6NYCRR 201-1.4

Item 51.1:

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



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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 52: Air pollution prohibited
Effective between the dates of 11/14/2006 and 11/13/2011

Applicable State Requirement: 6NYCRR 211.2

Item 52.1:

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.