Facility DEC ID: 1472800618

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 1-4728-00618/00007
Effective Date: 01/07/2022 Expiration Date: 01/06/2032

Permit Issued To: POLY CRAFT INDUSTRIES CORP
40 RANICK RD
HAUPPAUGE, NY 11788-4209

Contact: Yoel Lebowitz
Poly Craft Industries
40 Ranick Rd
Hauppauge, NY 11788-NY
(631) 234-5300

Facility: Poly Craft Industries
40 RANICK RD
HAUPPAUGE, NY 11788-4209

Contact: Deslie Paneth
Poly Craft Industries
40 Ranick Rd
Hauppauge, NY 11788
(631) 234-5300

Description:
This is a renewal of an Air State Facility Permit. Poly Craft Industries is a commercial flexographic printer on plastic bags. Solvent based inks are applied to the bags for commercial and industrial applications. Operations are located in a single story building. The facility operates under a seasonal variance. The facility has removed one (1) CMF-Mirage Model 806 Press and adds one (1) Uteco-Crystal 808 Model 130 8 Color Press. The facility's emissions of volatile organic compounds (VOCs) are capped below 22.5 tons per year to avoid major source status.
Facility DEC ID: 1472800618

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: SHERRI L AICHER  
NYSDEC - REGION 1 SUNY @ STONY BROOK  
50 CIRCLE RD  
STONY BROOK, NY 11790-3409

Authorized Signature: _________________________________ Date: ___ / ___ / _____
Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

<table>
<thead>
<tr>
<th>PAGE</th>
<th>DEC GENERAL CONDITIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>General Provisions</td>
</tr>
<tr>
<td>5</td>
<td>Facility Inspection by the Department</td>
</tr>
<tr>
<td>5</td>
<td>Relationship of this Permit to Other Department Orders and Determinations</td>
</tr>
<tr>
<td>5</td>
<td>Applications for permit renewals, modifications and transfers</td>
</tr>
<tr>
<td>6</td>
<td>Permit modifications, suspensions or revocations by the Department</td>
</tr>
<tr>
<td>6</td>
<td>Submission of application for permit modification or renewal - REGION 1 HEADQUARTERS</td>
</tr>
</tbody>
</table>
DEC GENERAL CONDITIONS

****   General Provisions   ****

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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

Item 1.1:  
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:  
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:  
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations  
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:  
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers  
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:  
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:  
The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3  
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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

Item 4.1: The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

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

**** Facility Level ****

Condition 5: Submission of application for permit modification or renewal - REGION 1
HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1: Applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 1 Headquarters
Division of Environmental Permits
Stony Brook University
50 Circle Road
Stony Brook, NY  11790-3409
(631) 444-0365
Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: POLY CRAFT INDUSTRIES CORP
40 RANICK RD
HAUPPAUGE, NY 11788-4209

Facility: Poly Craft Industries
40 RANICK RD
HAUPPAUGE, NY 11788-4209

Authorized Activity By Standard Industrial Classification Code:
2671 - PAPER COATED AND LAMINATED PACKAGING
2673 - BAGS: PLASTICS, LAMINATED AND COATED
2759 - COMMERCIAL PRINTING, NEC

Permit Effective Date: 01/07/2022
Permit Expiration Date: 01/06/2032
## Federally Enforceable Conditions

### Facility Level
- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 215.2: Open Fires - Prohibitions
- 3 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 4 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 6 40 CFR 82, Subpart F: Recycling and Emissions Reduction
- 7 6 NYCRR 201-7.1: Facility Permissible Emissions
- 8 *6 NYCRR 201-7.1: Capping Monitoring Condition
- 9 6 NYCRR 211.2: Visible Emissions Limited
- 10 6 NYCRR 234.6: Compliance Demonstration
- 11 6 NYCRR 234.7: Compliance Demonstration

### Emission Unit Level
- 12 6 NYCRR 201-7.1: Emission Unit Permissible Emissions
- 13 6 NYCRR 234.3 (a) (1) (ii) (‘a’): Compliance Demonstration
- 14 6 NYCRR 234.3 (h): Compliance Demonstration
- 15 6 NYCRR 234.4 (c): Compliance Demonstration
- 16 6 NYCRR 234.4 (c): Compliance Demonstration
- 17 6 NYCRR 234.8: Compliance Demonstration

## State Only Enforceable Conditions

### Facility Level
- 18 ECL 19-0301: Contaminant List
- 19 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 20 6 NYCRR Subpart 201-5: Emission Unit Definition
- 21 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 22 6 NYCRR 201-5.3 (c): CLCPA Applicability
- 23 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 24 6 NYCRR 211.1: Air pollution prohibited

### Emission Unit Level
- 25 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 26 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.
FEDERALLY ENFORCEABLE CONDITIONS

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

Item A: Sealing - 6 NYCRR 200.5
The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7
Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,
required to operate such device effectively.

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

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial
Activities - 6 NYCRR 201-3.3 (a)
The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: Required Emission Tests - 6 NYCRR 202-1.1
An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

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

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

**FEDERAL APPLICABLE REQUIREMENTS**
The following conditions are federally enforceable.

**Condition 1:** Acceptable Ambient Air Quality
Effective between the dates of 01/07/2022 and 01/06/2032

**Applicable Federal Requirement:** 6 NYCRR 200.6

**Item 1.1:**
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Condition 2:** Open Fires - Prohibitions
Effective between the dates of 01/07/2022 and 01/06/2032

**Applicable Federal Requirement:** 6 NYCRR 215.2

**Item 2.1:**
Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item 2.2**
Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:
(a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
(b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
(c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
(d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous
agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.

(e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.

(f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.

(g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.

(h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.

(i) Prescribed burns performed according to Part 194 of this Title.

(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**Condition 3: Exempt Sources - Proof of Eligibility**

**Effective between the dates of 01/07/2022 and 01/06/2032**

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

**Item 3.1:**

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

**Condition 4: Trivial Sources - Proof of Eligibility**

**Effective between the dates of 01/07/2022 and 01/06/2032**

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

**Item 4.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.
Condition 5: Accidental release provisions.
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable Federal Requirement: 40 CFR Part 68

Item 5.1:
If a chemical is listed in Tables 1, 2, 3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1, 2, 3 or 4, the following requirements will apply:

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

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

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

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

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

Condition 6: Recycling and Emissions Reduction
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable Federal Requirement: 40 CFR 82, Subpart F

Item 6.1:
The permittee shall comply with all applicable provisions of 40 CFR Part 82.

Condition 7: Facility Permissible Emissions
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 7.1:
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:

<table>
<thead>
<tr>
<th>CAS No: 0NY998-00-0</th>
<th>PTE: 45,000 pounds per year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name: VOC</td>
<td></td>
</tr>
</tbody>
</table>

Condition 8: Capping Monitoring Condition
Effective between the dates of 01/07/2022 and 01/06/2032
Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 8.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

Item 8.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 8.3:
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 8.4:
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 8.5:
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 8.6:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 8.7:
Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Annual total VOC Emissions shall not equal or exceed 22.5 tons per year. Emissions shall be determined monthly by ink and solvent usage records, VOC contents of ink and solvents, and destruction efficiency of control equipment.
All records and calculations shall be retained and reported to the department annually.

Parameter Monitored: VOC  
Upper Permit Limit: 22.5 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2022.  
Subsequent reports are due every 12 calendar month(s).

**Condition 9: Visible Emissions Limited**  
Effective between the dates of 01/07/2022 and 01/06/2032

**Applicable Federal Requirement:** 6 NYCRR 211.2

**Item 9.1:**  
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 10: Compliance Demonstration**  
Effective between the dates of 01/07/2022 and 01/06/2032

**Applicable Federal Requirement:** 6 NYCRR 234.6

**Item 10.1:**  
The Compliance Demonstration activity will be performed for the Facility.

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

**Item 10.2:**  
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
An owner or operator of a facility subject to this Part shall not:

(a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;
(c) Use open containers to store, dispose or dispense ink, coating or adhesive 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, coating or adhesive to a substrate.

Monitoring Frequency: DAILY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 11: Compliance Demonstration
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable Federal Requirement: 6 NYCRR 234.7

Item 11.1:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 11.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Purchase, use, and production records of ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material must be maintained in a format acceptable to the Department, and upon request, submitted to the Department. Any other information required to determine compliance with this Part must be provided to the Department in an acceptable format. Records must be maintained at the facility for five years.

The results of an analysis or other procedure used to establish compliance with this Part must be provided to the Department. Department representatives shall be permitted, during reasonable business hours, to obtain ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

The owner or operator of a graphic art facility which is not subject to the control requirements of this Part because its annual potential to emit VOC or its total actual VOC emissions, whichever applies is below the applicability criteria, must maintain records in a format acceptable to the Department that verify the facility's annual potential to emit VOC or its total actual VOC emissions. Upon request, these records must be submitted to the Department.
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**** Emission Unit Level ****

**Condition 12:**  
Emission Unit Permissible Emissions  
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable Federal Requirement: 6 NYCRR 201-7.1

**Item 12.1:**  
The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

- Emission Unit: U-00001
  - CAS No: 0NY998-00-0
  - Name: VOC
  - PTE(s): 1.095 pounds per hour
  - 45,000 pounds per year

**Condition 13:**  
Compliance Demonstration  
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable Federal Requirement: 6 NYCRR 234.3 (a) (1) (ii) ('a')

**Item 13.1:**  
The Compliance Demonstration activity will be performed for:

- Emission Unit: U-00001

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

**Item 13.2:**  
Compliance Demonstration shall include the following monitoring:

- Monitoring Type: INTERMITTENT EMISSION TESTING
- Monitoring Description:
  A packaging rotogravure, publication rotogravure, or flexographic printing process that uses ink, coating or adhesive containing VOC shall not operate if it: is located in a severe ozone non-attainment area; has an annual potential to emit VOC of 25 tons per year or more; or is located in a facility that has an annual potential to emit VOC of 50 tons per year or more, unless the printing process uses one of the following strategies to control VOCs:
A capture system and control equipment that provides for overall removal efficiency of at least 75.0 percent for a publication rotogravure printing process.

Lower Permit Limit: 75 percent reduction
Reference Test Method: Methods 18, 25 or 25a
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 14: Compliance Demonstration
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable Federal Requirement: 6 NYCRR 234.3 (h)

Item 14.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

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

Item 14.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
For printing processes subject to this Part, the department may allow sources that use control equipment with natural gas fired afterburners to shut down the natural gas fired afterburners from November 1st through March 31st for the purposes of natural gas conservation, provided that the commissioner has determined that this action will not jeopardize air quality.
In the case of Poly Craft Industries, the incinerator may be shut down from November 1st through March 31st, provided that the annual VOC emissions are maintained below 22.5 tons. Annual VOC emissions are to be calculated monthly using a rolling total.
For any month between November 1st and March 31st where the annual VOC total exceeds, or can be expected to exceed, 22.5 tons the incinerator must be operated.

Parameter Monitored: VOC
Upper Permit Limit: 22.5 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2022.
Subsequent reports are due every 12 calendar month(s).

**Condition 15: Compliance Demonstration**  
**Effective between the dates of 01/07/2022 and 01/06/2032**

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

**Item 15.1:**
The Compliance Demonstration activity will be performed for:

- Emission Unit: U-00001
- Regulated Contaminant(s):
  - CAS No: 0NY998-00-0 VOC

**Item 15.2:**
Compliance Demonstration shall include the following monitoring:

- Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
- Monitoring Description:
  - Continuous control equipment monitors for the following parameters must be installed, periodically calibrated, and operated at all times that the associated control equipment is operated:
    1. Combustion zone temperature of all oxidizers;
    2. Inlet temperature at the catalytic oxidizer bed;
    3. Break-through of VOC on a carbon adsorption unit; and
    4. Any other continuous monitoring or recording device required by the Department.

- Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 01/07/2022 and 01/06/2032**

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

**Item 16.1:**
The Compliance Demonstration activity will be performed for:

- Emission Unit: U-00001
- Regulated Contaminant(s):
  - CAS No: 0NY998-00-0 VOC
Item 16.2:
Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:
Ensure proper destruction of VOC emissions by maintaining a minimum operating temperature of 550 degrees Fahrenheit at the catalytic oxidizer inlet. This temperature will be maintained whenever printing operations are in progress, with the exception being when the oxidizer is shut down for natural gas conservation reasons. The temperature shall be continuously monitored and recorded, records must be kept at facility for five (5) years.

Manufacturer Name/Model Number: Anguil Model 75
Parameter Monitored: TEMPERATURE
Lower Permit Limit: 550  degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2022.
Subsequent reports are due every 12 calendar month(s).

Condition 17: Compliance Demonstration Effective between the dates of 01/07/2022 and 01/06/2032

Applicable Federal Requirement: 6 NYCRR 234.8

Item 17.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Item 17.2:
Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:
No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 10 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation. The permittee will conduct observations of visible
emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard. The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met. Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 10 percent
Reference Test Method: Method 9
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2022.
Subsequent reports are due every 12 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: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) an emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
(2) the equipment at the facility was being properly operated and maintained;
(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) the facility owner 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 any corrective actions taken.

(b) In any enforcement proceeding, the facility owner 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 malfunction provision contained in any applicable requirement.

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance
with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.

Condition 18: Contaminant List
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable State Requirement:ECL 19-0301

Item 18.1: Emissions of the following contaminants are subject to contaminant specific requirements in this permit (emission limits, control requirements or compliance monitoring conditions).

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

Condition 19: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable State Requirement:6 NYCRR 201-1.4
Item 19.1:
(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedence occurred and if it was unavoidable, include the time, frequency and duration of the exceedence, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedences to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 20: Emission Unit Definition
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 20.1:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: U-00001
Emission Unit Description:
Three (3) UTECO printing presses. All printing press exhausts are ducted directly to a catalytic fume oxidizer (EP 00008). Products include plastic and paper printed products typically used in flexible packaging. Each press has a print station, consisting of six to eight individual...
color stations, and an overhead drying section. Solvent laden exhaust is collected at both the print and drying stations and exhausted to the outdoors. Exhaust streams are manifolded from the three printing presses into a common exhaust header leading to the catalytic fume incinerator. Fugitive emissions not captured by the press are vented via five (5) general ventilation units (EP00009-00013).

Building(s): 1

**Condition 21:** Renewal deadlines for state facility permits

Effective between the dates of 01/07/2022 and 01/06/2032

Applicable State Requirement: 6 NYCRR 201-5.2 (c)

**Item 21.1:**
The owner or operator of a facility having an issued state facility 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.

**Condition 22:** CLCPA Applicability

Effective between the dates of 01/07/2022 and 01/06/2032

Applicable State Requirement: 6 NYCRR 201-5.3 (c)

**Item 22.1:**
Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

**Condition 23:** Compliance Demonstration

Effective between the dates of 01/07/2022 and 01/06/2032

Applicable State Requirement: 6 NYCRR 201-5.3 (c)

**Item 23.1:**
The Compliance Demonstration activity will be performed for the Facility.

**Item 23.2:**
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control
Engineer (RAPCE) at the following address:

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 1  
SUNY at Stony Brook  
Building 40  
Stony Brook, NY 11790-2356

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 24: Air pollution prohibited**  
Effective between the dates of 01/07/2022 and 01/06/2032

**Applicable State Requirement:** 6 NYCRR 211.1

**Item 24.1:**
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

**** Emission Unit Level ****

**Condition 25: Emission Point Definition By Emission Unit**  
Effective between the dates of 01/07/2022 and 01/06/2032

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

**Item 25.1:**
The following emission points are included in this permit for the cited Emission Unit:

**Emission Unit:**  U-00001

**Emission Point:**  00008  
Height (ft.): 29  
Diameter (in.): 30  
NYTMN (km.): 4519.286  
NYTME (km.): 649.327  
Building: 1

**Emission Point:**  00009  
Height (ft.): 20  
Length (in.): 26  
Width (in.): 18  
NYTMN (km.): 4519.287  
NYTME (km.): 649.331  
Building: 1

**Emission Point:**  00010  
Height (ft.): 21  
Length (in.): 48  
Width (in.): 49  
NYTMN (km.): 4519.316  
NYTME (km.): 649.334  
Building: 1
Emission Point: 00011
Height (ft.): 14 Length (in.): 42 Width (in.): 44
NYTMN (km.): 4519.28 NYTME (km.): 649.335 Building: 1

Emission Point: 00012
Height (ft.): 14 Length (in.): 42 Width (in.): 44
NYTMN (km.): 4519.28 NYTME (km.): 649.343 Building: 1

Emission Point: 00013
Height (ft.): 14 Length (in.): 42 Width (in.): 44
NYTMN (km.): 4519.28 NYTME (km.): 649.348 Building: 1

Condition 26: Process Definition By Emission Unit
Effective between the dates of 01/07/2022 and 01/06/2032

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 26.1:
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00001
Process: P01 Source Classification Code: 4-05-003-01
Process Description:
Two (2) Uteco Onyx 808 Printing Presses, one (1) Uteco 808 Model 130 Printing Press and one (1) Catalytic Fume Oxidizer. The facility operates under a seasonal variance, the oxidizer will run as needed to ensure cap compliance.

Emission Source/Control: CFO-1 - Control
Control Type: CATALYTIC OXIDATION

Emission Source/Control: UT001 - Process
Design Capacity: 440 meters per minute

Emission Source/Control: UT002 - Process
Design Capacity: 400 meters per minute

Emission Source/Control: UT003 - Process
Design Capacity: 500 meters per minute