

Facility DEC ID: 3392400190

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-3924-00190/00006
Mod 0 Effective Date: 01/29/2013 Expiration Date: 01/28/2023
Mod 1 Effective Date: 07/30/2021 Expiration Date: 01/28/2023

Permit Issued To: API INDUSTRIES INC
2 GLENSHAW ST
ORANGEBURG, NY 10962

Contact: DAVID ANDERSON
2 GLENSHAW ST
ORANGEBURG, NY 10962
(845) 365-2200

Facility: ALUF PLASTICS DIVISION
2 GLENSHAW ST
ORANGEBURG, NY 10962

Contact: DAVID ANDERSON
2 GLENSHAW ST
ORANGEBURG, NY 10962
(845) 365-2200

Description:

This project consists of the modification of the air state facility permit for Aluf Plastics Division. Aluf is modifying their permit to include the installation of an improved facility ventilation system intended to reduce fugitive emissions from the plastic extrusion processes conducted on site. The facility will also increase the number of extrusion lines and storage silo emission sources as part of this application.

The proposed ventilation system will increase the amount of make-up air supplied to the various rooms and process operations, which will eliminate smoke and haze from process rooms, increase operator comfort, allow all building doors to remain closed when not in use, and balance air flow between building rooms. This project also includes the installation of door alarms and implementation other work practices intended to reduce excess fugitive emissions and odors from the facility.

Facility DEC ID: 3392400190

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: JOHN W PETRONELLA
NYSDEC - REGION 3
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561-1696

Authorized Signature: _____ Date: ___ / ___ / _____

Facility DEC ID: 3392400190

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.

Facility DEC ID: 3392400190

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 5 1 Facility Inspection by the Department
- 5 2 Relationship of this Permit to Other Department Orders and Determinations
- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Applications for permit renewals, modifications and transfers
- 6 5 Permit modifications, suspensions or revocations by the Department

Facility Level

- 6 6 Submission of application for permit modification or renewal
-REGION 3 HEADQUARTERS
- 7 7 Submission of application for permit modification or
renewal-REGION 3 HEADQUARTERS

Facility DEC ID: 3392400190

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 expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

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

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

Facility DEC ID: 3392400190

Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3

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

Condition 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 1-2: Submission of application for permit modification or renewal
-REGION 3**

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 1-2.1:

Submission of applications for permit modification or renewal are to be submitted to:
 NYSDEC Regional Permit Administrator
 Region 3 Headquarters
 Division of Environmental Permits
 21 South Putt Corners Road
 New Paltz, NY 12561-1696
 (845) 256-3054

Facility DEC ID: 3392400190

Condition 5: Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

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

NYSDEC Regional Permit Administrator

Region 3 Headquarters

Division of Environmental Permits

21 South Putt Corners Road

New Paltz, NY 12561-1696

(845) 256-3054

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: API INDUSTRIES INC
2 GLENSHAW ST
ORANGEBURG, NY 10962

Facility: ALUF PLASTICS DIVISION
2 GLENSHAW ST
ORANGEBURG, NY 10962

Authorized Activity By Standard Industrial Classification Code:
3089 - PLASTICS PRODUCTS, NEC

Mod 0 Permit Effective Date: 01/29/2013

Permit Expiration Date: 01/28/2023

Mod 1 Permit Effective Date: 07/30/2021

Permit Expiration Date: 01/28/2023

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 6 1-1 6 NYCRR 200.7: Maintenance of Equipment
- 6 1-2 6 NYCRR 200.7: Compliance Demonstration
- 7 1-3 6 NYCRR 200.7: Compliance Demonstration
- 7 1-4 6 NYCRR 200.7: Compliance Demonstration
- 8 12 6 NYCRR 211.2: Visible Emissions Limited
- 8 1-5 6 NYCRR 211.2: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 12 8 ECL 19-0301: Contaminant List
- 12 1-6 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 13 10 6 NYCRR Subpart 201-5: Emission Unit Definition
- 16 1-7 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 16 1-8 6 NYCRR 201-5.3 (c): CLCPA Applicability
- 16 1-9 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 17 1-10 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 18 1-11 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 19 1-12 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 19 1-13 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 20 1-14 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 21 1-15 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 21 3 6 NYCRR 211.1: Air pollution prohibited
- 21 1-16 6 NYCRR 211.1: Compliance Demonstration

Emission Unit Level

- 23 13 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 25 14 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=0-00001,Proc=001

- 28 1-17 6 NYCRR 201-5.3 (c): Compliance Demonstration

EU=0-00003,Proc=003

- 29 1-18 6 NYCRR 201-5.3 (c): Compliance Demonstration

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

FEDERALLY ENFORCEABLE CONDITIONS

Mod 1/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

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

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

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

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

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 1-1: Maintenance of Equipment
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable Federal Requirement:6 NYCRR 200.7

Item 1-1.1:

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 1-2: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable Federal Requirement:6 NYCRR 200.7

Item 1-2.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: 0-00001

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is required to perform all preventative maintenance as required by the Ozone Generator Procedures. The unit shall be visually inspected at a minimum of once monthly, as well as cleaned at a frequency of no greater than every 30 days. The date and time of the inspection, as well as the technician and conclusions found must be recorded in a maintenance logbook. Records should be maintained in a logbook and retained for a minimum of 5 years. Any defective, broken, or inoperable parts identified during the inspection shall be promptly

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

replaced. The facility must have Ozone Generator replacement parts at the facility or ordered within five days after the inspection identifying that a part requires replacement.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-3: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable Federal Requirement:6 NYCRR 200.7

Item 1-3.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: 0-00001

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator must maintain the Ozone Generator in good working condition as required by 6 NYCRR Section 200.7 and in accordance with the approved Ozone Generator Procedures specified by the manufacturer. A copy of the approved Ozone Generator Procedures shall be maintained on site with the permit for this facility at all times. The facility owner or operator must periodically review and update the Ozone Generator Procedures as required by the manufacturer.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-4: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable Federal Requirement:6 NYCRR 200.7

Replaces Condition(s) 2

Item 1-4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Aluf Plastics shall operate and maintain the particulate removal systems and carbon adsorption units in accordance with good engineering practice and engineering specification. Particulate removal systems and carbon adsorption units, including in-line carbon filters and in-line HEPA filters, shall be inspected weekly and exchanged as needed in accordance with good engineering practice and engineering specifications. Breakthrough of the carbon adsorption units shall be avoided by implementing scheduled replacement based on the engineering design. Facility shall perform weekly inspections of all filters.

In the event a nuisance condition is detected prior to scheduled maintenance, Aluf Plastics must perform an investigation and corrective action within 24 hours. The Department shall be notified of each nuisance condition immediately. Such notification shall describe the cause of the nuisance condition and any corrective action completed. Instances which require more than 24 hours to complete corrective action must be itemized and acceptable to the Department.

Aluf Plastics must keep records of the date and description of each scheduled and unscheduled maintenance procedure completed. The facility will also keep records of inspection and replacement dates. These records must be maintained onsite and available for Department review.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Visible Emissions Limited
Effective between the dates of 01/29/2013 and 01/28/2023

Applicable Federal Requirement:6 NYCRR 211.2

Item 12.1:

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 1-5: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable Federal Requirement:6 NYCRR 211.2

Item 1-5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-5.2:

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Except as permitted by a specific part of Title 6 of the NYCRR, 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.

Operators of air contamination sources that are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

1) Observe the stack(s) or vent(s) once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days, then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 57 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ONE CONTINUOUS 6-MINUTE PERIOD PER HOUR

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2022.

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: Emergency Defense - 6 NYCRR 201-1.5

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
 - (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
 - (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Item 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 8: Contaminant List
Effective between the dates of 01/29/2013 and 01/28/2023

Applicable State Requirement:ECL 19-0301

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

No contaminants.

Condition 1-6: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-6.1:

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

- (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 exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, 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 exceedances 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 10: Emission Unit Definition

Effective between the dates of 01/29/2013 and 01/28/2023

Applicable State Requirement:6 NYCRR Subpart 201-5**Item 10.1(From Mod 1):**

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

Emission Unit: 0-00001

Emission Unit Description:

This emission unit consists of four (4) polyethylene reprocessing and extrusion lines (REPO1, REPO2, REPO3 and REPO4) that discharge through Emission Point 00011.

Emissions are captured by a dedicated exhaust hood (total of 7 hoods). Each line has at least one exhaust hood associated with it. Fumes are then subject to ozone molecules via the Ozone Generating Unit. Fumes are then

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

pulled via an induced draft (ID) fan into a cyclone followed by a 3-stage filter assembly. The three stage filter consists of a blue poly pad, a pleated filter, and a 10 pocket bag filter (Vee Bag). The lines are then pulled by a second ID fan and manifold into a four stage custom built assembly. The four stage filter consists of a blue poly pad next to a pleated filter, followed by a Vee Bag, and finally a HEPA filter. From this assembly, the fumes are then sent under positive pressure to a custom pre-built filter housing with four Flanders PrecisionAire Filters (24"x24"x2"), and finally to the US Filter Model RB-10 treatment absorber equipped with 10,000 pounds of activated carbon.

Building(s): 001

Item 10.2(From Mod 1):

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

Emission Unit: 0-00002

Emission Unit Description:

This emission unit consists of 12 silos used to store plastic pellets and virgin resin.

Building(s): 001

Item 10.3(From Mod 1):

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

Emission Unit: 0-00003

Emission Unit Description:

This emission unit consists of 11 plastic bag extrusion lines using Internal Bubble Cooling Dies. Exhaust from the creation of the bubble is exhausted outside of the building via emission point 00021. The exhaust carries various Hazardous Air Pollutants (HAPs) from the melting process. The exhaust passes through both particulate controls (i.e. baffled pressure equalization chamber for primary control and 2 cyclones in series for secondary control) and formaldehyde controls (i.e. carbon adsorption) prior to being emitted.

This emission unit includes the following emission source extrusion lines:

EX300, EX301, EX302, EX303, EX304, EX401, EX402, EX403, EX404, EX405, and EX504

Building(s): 001

Item 10.4(From Mod 1):

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

Emission Unit: 0-00004

Emission Unit Description:

This emission unit consists of 6 plastic bag extrusion lines using Internal Bubble Cooling Dies. Exhaust from the

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

creation of the bubble is exhausted outside of the building via emission point 00022. The exhaust carries various Hazardous Air Pollutants (HAPs) from the melting process. The exhaust passes through both particulate controls (i.e. baffled pressure equalization chamber for primary control and 2 cyclones in series for secondary control) and formaldehyde controls (i.e. carbon adsorption) prior to being emitted.

This emission unit includes the following emission source extrusion lines:

EXT15, EXT16, EXT17, EXT18, EXT21, and EXT22

Building(s): 001

Item 10.5(From Mod 1):

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

Emission Unit: 0-00005

Emission Unit Description:

This emission unit consists of 5 plastic bag extrusion lines using Internal Bubble Cooling Dies. Exhaust from the creation of the bubble is exhausted outside of the building via emission point 00023. The exhaust carries various Hazardous Air Pollutants (HAPs) from the melting process. The exhaust passes through both particulate controls (i.e. baffled pressure equalization chamber for primary control and 2 cyclones in series for secondary control) and formaldehyde controls (i.e. carbon adsorption) prior to being emitted.

This emission unit includes the following emission source extrusion lines:

EXT07, EXT08, EXT11, EXT12, and EXT13

Building(s): 001

Item 10.6(From Mod 1):

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

Emission Unit: 0-00006

Emission Unit Description:

This emission unit consists of 9 plastic bag extrusion lines using Internal Bubble Cooling Dies. Exhaust from the creation of the bubble is exhausted outside of the building via emission point 00024. The exhaust carries various Hazardous Air Pollutants (HAPs) from the melting process. The exhaust passes through both particulate controls (i.e. baffled pressure equalization chamber for primary control and 2 cyclones in series for secondary control) and formaldehyde controls (i.e. carbon adsorption) prior to being emitted.

This emission unit includes the following emission source extrusion lines:

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

EXT02, EXT03, EXT05, EXT06, EXT09, EXT10, EXT14, EXT19,
and EXT20

Building(s): 001

Condition 1-7: Renewal deadlines for state facility permits
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-7.1:

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 1-8: CLCPA Applicability
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-8.1:

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 1-9: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-9.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: 0-00001

Item 1-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is required to have at least one of the Ozone Generator units operating at all times when the retail exhaust system is running. If both Ozone Generating Units are not operational, the facility must immediately cease operation of any fragrance lines in the retail process. The facility is required to record the date and duration of any such shutdowns the plant experiences, as well as the cause of the issues and the corrective action

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

performed. Records should be maintained in a logbook and retained for a minimum of 5 years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-10: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-10.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

After a complaint is received through the facility's online complaint portal [<http://alufcommunity.com/complaint/>], the facility is required to perform the following within 60 minutes from the time a complaint is received (as indicated in the complaint form):

1. Notify NYSDEC of the complaint via email at r3.alufcomplaints@dec.ny.gov
2. Internally investigate all odor control systems for proper operation as in accordance with the manufacturer's Ozone Generator Procedures. If the odor control systems are not properly operating or if the facility operating conditions are not functioning as per the Ozone Generator Procedures, the facility must cease operations of any fragrance lines in the retail process.
3. Investigate the complaint and record any pertinent information such as detected odors, if any, at the facility and complaint location, wind speed, wind direction and facility operating conditions at the time of the complaint if the reported complaint location is within 1 mile from the facility; and
4. Perform olfactometer readings beyond the property line only if the time at which the complaint was reported was within 60 minutes from the time it was detected by the complainant (as indicated in the complaint form), and the reported complaint location is within 1 mile from the facility.

Olfactometer readings shall be collected at a point just

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

beyond the facility property line relative to the complaint location and at the complaint location within 60 minutes of a complaint being received by the facility between 8AM and 5PM Monday through Friday, or as soon as practicable at all other times. If the two olfactometer readings are greater than 7 dilutions to threshold (D/T) during the investigation, then the facility must cease any processes that might be causing odors that exceed this standard. The facility is required to record the date, duration, olfactometer readings, and inspector of each olfactometer test. If the facility identifies an issue while undertaking any of the foregoing investigative actions, the facility must document the issue, identify its source cause and undertake corrective action.

All records used to determine and evaluate compliance with odor complaints must be kept at the facility (or other Department approved location) for a minimum of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-11: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-11.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: 0-00001

Emission Unit: 0-00003

Item 1-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator must have the vendors inspect and sample the carbon unit from the reprocessing area every 3 months during the first year after recharging the carbon unit and semi-annually thereafter. The date, time, and results of each inspection shall be maintained in log. The log must be kept on site for a period of a least 5 years.

Monitoring Frequency: QUARTERLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Reports due 30 days after the reporting period.
 The initial report is due 1/30/2022.
 Subsequent reports are due every 6 calendar month(s).

Condition 1-12: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator must ensure the Reverse a Duct Bladder is maintained in good working condition and positioned properly based on the time of year. During winter operation, the inner bladder must be installed over the bottom collar to blow air up. During summer operation, the inner bladder must be installed over the top collar to blow air down. The facility owner or operator shall maintain a log of any change in bladder position and the date at which it occurs. The records shall be kept on site for a period of at least 5 years and made available to the department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-13: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-13.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The ventilation system must always be turned on during any operation at the facility. The facility owner or operator shall operate the ventilation system for a minimum of two (2) hours after the last extrusion line has been shut down on any day that the air temperature outside of the facility is over forty (40) degrees Fahrenheit and when the day following shut down is a day

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

on which the facility is scheduled to operate. If the air temperature outside of the facility is 40 degrees Fahrenheit or less at the time of shut down of the last extrusion line or if the facility is not scheduled to be in operation on the subsequent day, the ventilation system shall be operated for a minimum of one (1) hour after the last extrusion line has been shut down. The facility owner or operator shall maintain records indicating the date and time the last extrusion line was shut down and the date and time the ventilation system was shut down.

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 1/30/2022.
 Subsequent reports are due every 6 calendar month(s).

Condition 1-14: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Aluf shall install automatic closure devices and alarms on all exterior personnel doors at the facility in accordance with fire safety requirements. Alarms on exterior personnel doors shall sound locally and shall alert a shift supervisor if any door remains open longer than 15 minutes. Aluf Plastics shall maintain a record of the date and time of all door alarms for doors that remain open for longer than 15 minutes. Such records must be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Loading dock doors shall be closed when not in use. When loading dock doors are in use, Aluf Plastics shall ensure that a weatherproof seal is in place. Aluf Plastics shall post signs near the loading dock doors stating that loading dock doors must be closed when not in use.

All other material handling doors shall be equipped with plastic weather curtains.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2022.
Subsequent reports are due every 6 calendar month(s).

Condition 1-15: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-15.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 1-15.2:
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 3
21 South Putt Corners Rd.
New Paltz, NY 12561

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2022.
Subsequent reports are due every 6 calendar month(s).

Condition 3: Air pollution prohibited
Effective between the dates of 01/29/2013 and 01/28/2023

Applicable State Requirement:6 NYCRR 211.1

Item 3.1:
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 1-16: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

Applicable State Requirement:6 NYCRR 211.1

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Item 1-16.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is subject to 6 NYCRR 211.1, which states:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristics 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.

If complaints of odors are received, then the facility must promptly investigate the complaints in order to determine compliance with the requirements of 6 NYCRR § 211.1. A log shall apply corrective measures as necessary. A log of all complaints received must be kept in a bound logbook or other format acceptable to the Department.

The following data must be recorded for each observation:

- The date and time of the complaint;
- The name, address, and phone number of the complainant (if given);
- The complainant’s description of the complaint;
- The facility’s evaluation of the complaint; and
- The corrective measure taken, if necessary.

Records should be maintained in a logbook and retained for a minimum of 5 years. A logbook shall be considered retained at the facility if electronically stored and accessible by computer at the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Condition 13: Emission Point Definition By Emission Unit
Effective between the dates of 01/29/2013 and 01/28/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 13.1(From Mod 1):

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

Emission Unit: 0-00001

Emission Point: 00011

Height (ft.): 65

Diameter (in.): 8

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.2(From Mod 1):

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

Emission Unit: 0-00002

Emission Point: 00016

Height (ft.): 60

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00017

Height (ft.): 60

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00018

Height (ft.): 26

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00019

Height (ft.): 26

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00020

Height (ft.): 26

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00025

Height (ft.): 60

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00026

Height (ft.): 60

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00027

Height (ft.): 60

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.3(From Mod 1):

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

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

Emission Unit: 0-00003

Emission Point: 00021

Height (ft.): 26

Diameter (in.): 6

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.4(From Mod 1):

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

Emission Unit: 0-00004

Emission Point: 00022

Height (ft.): 65

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.5(From Mod 1):

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

Emission Unit: 0-00005

Emission Point: 00023

Height (ft.): 65

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.6(From Mod 1):

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

Emission Unit: 0-00006

Emission Point: 00024

Height (ft.): 71

Diameter (in.): 24

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Item 13.7(From Mod 0):

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

Emission Unit: 0-00002

Emission Point: 00012

Height (ft.): 15

Diameter (in.): 8

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00013

Height (ft.): 8 Diameter (in.): 8

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00014

Height (ft.): 8 Diameter (in.): 8

NYTMN (km.): 4545.43

NYTME (km.): 588.176

Emission Point: 00015

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Height (ft.): 15 Diameter (in.): 8
NYTMN (km.): 4545.43 NYTME (km.): 588.176

Condition 14: Process Definition By Emission Unit
Effective between the dates of 01/29/2013 and 01/28/2023

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 14.1(From Mod 1):

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

Emission Unit: 0-00001
Process: 001 Source Classification Code: 3-01-018-91
Process Description:
 This process consists of the reprocessing and extrusion
 of polyethylene in four polyethylene reprocessing and
 extrusion lines.

Emission Source/Control: CAR11 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF11 - Control
Control Type: PARTICULATE TRAP

Emission Source/Control: OZONE - Control
Control Type: OZONATION

Emission Source/Control: REPO1 - Process

Emission Source/Control: REPO2 - Process

Emission Source/Control: REPO3 - Process

Emission Source/Control: REPO4 - Process

Item 14.2(From Mod 1):

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

Emission Unit: 0-00002
Process: 002 Source Classification Code: 3-01-018-64
Process Description:
 This process consists of the bulk storage of plastic
 pellets and virgin resin in storage silos.

Emission Source/Control: SIL10 - Process

Emission Source/Control: SIL11 - Process

Emission Source/Control: SIL12 - Process

Emission Source/Control: SILO1 - Process

Emission Source/Control: SILO2 - Process

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Emission Source/Control: SILO3 - Process

Emission Source/Control: SILO4 - Process

Emission Source/Control: SILO5 - Process

Emission Source/Control: SILO6 - Process

Emission Source/Control: SILO7 - Process

Emission Source/Control: SILO8 - Process

Emission Source/Control: SILO9 - Process

Item 14.3(From Mod 1):

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

Emission Unit: 0-00003

Process: 003

Source Classification Code: 3-08-010-02

Process Description:

This process consists of polyethylene extrusion to form plastic bags using Internal Bubble Cooling Dies.

Emission Source/Control: CAR21 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF21 - Control

Control Type: PARTICULATE TRAP

Emission Source/Control: EX300 - Process

Emission Source/Control: EX301 - Process

Emission Source/Control: EX302 - Process

Emission Source/Control: EX303 - Process

Emission Source/Control: EX304 - Process

Emission Source/Control: EX401 - Process

Emission Source/Control: EX402 - Process

Emission Source/Control: EX403 - Process

Emission Source/Control: EX404 - Process

Emission Source/Control: EX405 - Process

Emission Source/Control: EX504 - Process

Item 14.4(From Mod 1):

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

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

Emission Unit: 0-00004

Process: 004

Source Classification Code: 3-08-010-02

Process Description:

This process consists of polyethylene extrusion to form plastic bags using Internal Bubble Cooling Dies.

Emission Source/Control: CAR22 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF22 - Control

Control Type: PARTICULATE TRAP

Emission Source/Control: EXT15 - Process

Emission Source/Control: EXT16 - Process

Emission Source/Control: EXT17 - Process

Emission Source/Control: EXT18 - Process

Emission Source/Control: EXT21 - Process

Emission Source/Control: EXT22 - Process

Item 14.5(From Mod 1):

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

Emission Unit: 0-00005

Process: 005

Source Classification Code: 3-08-010-02

Process Description:

This process consists of polyethylene extrusion to form plastic bags using Internal Bubble Cooling Dies.

Emission Source/Control: CAR23 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF23 - Control

Control Type: PARTICULATE TRAP

Emission Source/Control: EXT07 - Process

Emission Source/Control: EXT08 - Process

Emission Source/Control: EXT11 - Process

Emission Source/Control: EXT12 - Process

Emission Source/Control: EXT13 - Process

Item 14.6(From Mod 1):

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

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

Emission Unit: 0-00006

Process: 006

Source Classification Code: 3-08-010-02

Process Description:

This process consists of polyethylene extrusion to form plastic bags using Internal Bubble Cooling Dies.

Emission Source/Control: CAR24 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF24 - Control

Control Type: PARTICULATE TRAP

Emission Source/Control: EXT02 - Process

Emission Source/Control: EXT03 - Process

Emission Source/Control: EXT05 - Process

Emission Source/Control: EXT06 - Process

Emission Source/Control: EXT09 - Process

Emission Source/Control: EXT10 - Process

Emission Source/Control: EXT14 - Process

Emission Source/Control: EXT19 - Process

Emission Source/Control: EXT20 - Process

Condition 1-17: Compliance Demonstration

Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: 001

Item 1-17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Aluf Plastics shall only accept film, compressed blocks, pellets, or chopped scrap polyethylene for processing at the facility. Any other type of plastic in film or any other form shall be rejected.

Aluf Plastics shall inspect each delivery of post

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

industrial scrap film and determine whether it includes face printing (Incoming film with more than 25% of face printing shall be rejected).

Aluf Plastics shall make operational observations of the Repro process in order to determine whether any film is generating excessive smoke. If a film is found to generate excessive smoke, it shall be rejected in the future. The facility shall maintain a log of all rejected films and shall post the log in the scale room for use during incoming plastic inspection.

Internal scrap generated from in house processes is excluded from the inspection procedures described in this condition.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-18: Compliance Demonstration
Effective between the dates of 07/30/2021 and 01/28/2023

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

Item 1-18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

Process: 003

Item 1-18.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to prevent process temperatures from reaching the point where significant degradation of polyethylene may occur, Aluf Plastics shall ensure that temperature controllers on its extruders cause a high-temperature alarm to be activated when the extrusion melt temperature reaches 500 degrees Fahrenheit and shall implement internal procedures to respond to high temperature alarms. Aluf Plastics shall ensure that the temperature controller automatically shuts down the extruders when the extrusion melt temperature reaches 550 degrees Fahrenheit.

Aluf Plastics shall maintain a log including the date and time of each instance of high temperature alarms and/or high temperature shutdowns. Data retention for high temperature alarms shall be maintained on a ninety (90)

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190

day rolling report to reflect all such high temperature alarms and/or high temperature shutdowns for the immediately preceding 90 days. Results must be submitted to the department.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

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 1/30/2022.

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

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190