

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-3730-00082/02002
Mod 0 Effective Date: 01/24/2019 Expiration Date: 01/23/2029
Mod 1 Effective Date: 10/13/2021 Expiration Date: 01/23/2029

Permit Issued To: DUNMORE INTERNATIONAL CORP.
145 WHARTON RD
BRISTOL, PA 19007

Facility: DUNMORE INTERNATIONAL CORPORATION
3633 DANBURY RD
BREWSTER, NY 10509

Contact: THOMAS S RIMEL, JR
DUNMORE INTERNATIONAL CORPORATION
145 WHARTON RD
BRISTOL, PA 19007-1620
(215) 781-8895

Description:
Dunmore Corporation is a film coating operation in Brewster, New York. The facility utilizes three lines to apply various coatings to a plastic film substrate of numerous manufacturers' products. Coatings are applied within a total enclosure providing 100 percent capture efficiency of VOC emissions. A solvent recovery still and mixing area support coating operations.

Modification 1 is to replace the current catalytic oxidizer with a new regenerative thermal oxidizer.

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: REBECCA S CRIST
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561

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

PAGE

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- 5 5 Submission of application for permit modification or renewal
-REGION 3 HEADQUARTERS
- 5 6 Submission of application for permit modification or
renewal-REGION 3 HEADQUARTERS

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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 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.

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

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 1-1.1:

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

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 Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: DUNMORE INTERNATIONAL CORP.
145 WHARTON RD
BRISTOL, PA 19007

Facility: DUNMORE INTERNATIONAL CORPORATION
3633 DANBURY RD
BREWSTER, NY 10509

Authorized Activity By Standard Industrial Classification Code:
3081 - UNSUPPORTED PLASTICS FILM AND SHEET
3089 - PLASTICS PRODUCTS, NEC

Mod 0 Permit Effective Date: 01/24/2019

Permit Expiration Date: 01/23/2029

Mod 1 Permit Effective Date: 10/13/2021

Permit Expiration Date: 01/23/2029

PAGE LOCATION OF CONDITIONS**PAGE****FEDERALLY ENFORCEABLE CONDITIONS****Facility Level**

6	1-1 6 NYCRR 200.7: Maintenance of Equipment
6	2 6 NYCRR 202-1.1: Required Emissions Tests
6	3 6 NYCRR 201-7.1: Facility Permissible Emissions
7	*1-2 6 NYCRR 201-7.1: Capping Monitoring Condition
8	*1-3 6 NYCRR 201-7.1: Capping Monitoring Condition
10	*1-4 6 NYCRR 201-7.1: Capping Monitoring Condition
11	25 6 NYCRR 211.2: Visible Emissions Limited
11	8 6 NYCRR 212-2.4 (b): Compliance Demonstration
12	1-5 6 NYCRR 228-1.1 (a) (2): Compliance Demonstration
13	9 6 NYCRR 228-1.3 (a): Compliance Demonstration

Emission Unit Level**EU=A-00001**

14	19 6 NYCRR 212-1.4 (l) (1): Part 228-1 process emission sources with respect to A-rated VOC contaminants
14	13 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
15	1-7 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
15	14 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
16	1-6 6 NYCRR 228-1.5 (b): Natural gas fired VOC incineration control device efficiency and seasonal shut down.
17	16 6 NYCRR 228-1.6 (a): Compliance Demonstration
17	17 6 NYCRR 228-1.6 (h): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS**Facility Level**

20	20 ECL 19-0301: Contaminant List
21	1-8 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
21	22 6 NYCRR Subpart 201-5: Emission Unit Definition
22	23 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
22	1-9 6 NYCRR 201-5.3 (c): CLCPA Applicability
22	24 6 NYCRR 201-5.3 (c): Compliance Demonstration
23	7 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

23	26 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
24	27 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.

FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/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.

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 1-1: Maintenance of Equipment
Effective between the dates of 10/13/2021 and 01/23/2029

Applicable Federal Requirement:6 NYCRR 200.7

Replaces Condition(s) 1

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 2: Required Emissions Tests
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 2.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 3: Facility Permissible Emissions
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 3.1:

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

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

per year CAS No: 000078-93-3 (From Mod 1) PTE: 15,000 pounds

Name: METHYL ETHYL KETONE

per year CAS No: 000108-88-3 (From Mod 1) PTE: 15,000 pounds

Name: TOLUENE

per year CAS No: 0NY100-00-0 (From Mod 1) PTE: 42,000 pounds

Name: TOTAL HAP

per year CAS No: 0NY998-00-0 (From Mod 1) PTE: 90,000 pounds

Name: VOC

Condition 1-2: Capping Monitoring Condition
Effective between the dates of 10/13/2021 and 01/23/2029

Applicable Federal Requirement:6 NYCRR 201-7.1

Replaces Condition(s) 4

Item 1-2.1:

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 1-2.2:

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

Item 1-2.3:

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 1-2.4:

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 1-2.5:

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 1-2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility shall ensure emissions of VOC do not exceed 45 tons per year (90,000 pounds per year) during any 12-month rolling period. The facility shall demonstrate compliance with this limit by calculating monthly and rolling 12-month total emissions of VOC using the following formula for each coating type used:

$$Z = [(A \times B) / C] \times D$$

Where:

Z = Total monthly VOC emissions

A = Coating Application Rate (lb/hr)

B = VOC Content

C = Coating Density (lb/gallons)

D = Operation Hours (hrs/month)

The facility owner or operator shall maintain a record of each calculation made pursuant to this condition and all supporting information at the facility for a period of at least five years. Records kept pursuant to this condition shall be made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 45 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM 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 1-3: Capping Monitoring Condition
Effective between the dates of 10/13/2021 and 01/23/2029

Applicable Federal Requirement: 6 NYCRR 201-7.1

Replaces Condition(s) 5

Item 1-3.1:

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

6 NYCRR Subpart 201-6

Item 1-3.2:

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

Item 1-3.3:

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

Item 1-3.4:

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

Item 1-3.5:

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

Item 1-3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000078-93-3	METHYL ETHYL KETONE
CAS No: 000108-88-3	TOLUENE

Item 1-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility shall ensure emissions of each individual hazardous air pollutant (HAP) are limited to 7.5 tons in any 12-month rolling period. The facility shall demonstrate compliance with this limit by calculating monthly and rolling 12-month total emissions of each individual HAP based on all raw ingredients used in a month. Facility will track raw chemical usage and calculate monthly HAPs based on the percent amount of each HAP within each specific raw ingredient.

The facility owner or operator shall maintain a record of each calculation made pursuant to this condition and all supporting information at the facility for a period of at least five years. Records kept pursuant to this condition

shall be made available to the Department upon request.

Parameter Monitored: SPECIATED HAP (MASS)
Upper Permit Limit: 7.5 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM 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 1-4: Capping Monitoring Condition
Effective between the dates of 10/13/2021 and 01/23/2029

Applicable Federal Requirement: 6 NYCRR 201-7.1

Replaces Condition(s) 6

Item 1-4.1:

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

6 NYCRR Subpart 201-6

Item 1-4.2:

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

Item 1-4.3:

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

Item 1-4.4:

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

Item 1-4.5:

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

Item 1-4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 1-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility shall ensure emissions of Total Hazardous Air Pollutants (HAP) in any 12-month rolling period. The facility shall demonstrate compliance with this limit by calculating monthly and rolling 12-month total emissions of HAPs based on all raw ingredients used in a month. Facility will track raw chemical usage and calculate monthly HAPs based on the percent amount of each HAP within each specific raw ingredient.

The facility owner or operator shall maintain a record of each calculation made pursuant to this condition and all supporting information at the facility for a period of at least five years. Records kept pursuant to this condition shall be made available to the Department upon request.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 21 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM 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 25: Visible Emissions Limited
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable Federal Requirement:6 NYCRR 211.2

Item 25.1:

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 8: Compliance Demonstration
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable Federal Requirement:6 NYCRR 212-2.4 (b)

Item 8.1:

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

Emission Unit: A-00001	Emission Point: 00100
Emission Unit: A-00001	Emission Point: 00101
Emission Unit: A-00001	Emission Point: 00102
Emission Unit: A-00001	Emission Point: 00103
Regulated Contaminant(s):	
CAS No: 0NY075-00-0	PARTICULATES

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No facility owner or operator shall cause or allow emissions of particulates that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Emission testing will be conducted if directed by the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-5: Compliance Demonstration
Effective between the dates of 10/13/2021 and 01/23/2029

Applicable Federal Requirement: 6 NYCRR 228-1.1 (a) (2)

Replaces Condition(s) 11

Item 1-5.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: A-00001

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

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Plastic film coating lines are not specifically listed in Table 1 of Part 228-1. However, in accordance with Part 228-1.1(a)(2), coating lines are subject to VOC control requirements.

As established in the previous permit, the VOC content in the coatings applied to plastic film is limited to 2.9 pounds of VOC per gallon of coating (minus water and excluded compounds). This limit applies when emissions from the coating lines are not directed to the regenerative thermal oxidizer.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Compliance Demonstration
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable Federal Requirement:6 NYCRR 228-1.3 (a)

Item 9.1:

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

Emission Unit: A-00001	Emission Point: 00100
Emission Unit: A-00001	Emission Point: 00101
Emission Unit: A-00001	Emission Point: 00102
Emission Unit: A-00001	Emission Point: 00104

Item 9.2:

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 to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six minute period from any emission source subject to 6NYCRR Part 228-1. The Department reserves the right to perform or require the performance of a Method 9 visible emissions observation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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

**Condition 19: Part 228-1 process emission sources with respect to
A-rated VOC contaminants
Effective between the dates of 01/24/2019 and 01/23/2029**

Applicable Federal Requirement:6 NYCRR 212-1.4 (l) (1)

Item 19.1:

This Condition applies to Emission Unit: A-00001

Item 19.2:

The following process emission sources are not subject to the provisions of Part 212:

(l)(1) process emission sources subject to Table 1 of Subpart 228-1 of this Title or process emission sources exempt from Subpart 228-1 of this Title pursuant to paragraph 228-1.1(b), only with respect to emissions of VOCs that are not given an A rating.

**Condition 13: Compliance Demonstration
Effective between the dates of 01/24/2019 and 01/23/2029**

Applicable Federal Requirement:6 NYCRR 228-1.3 (b) (1)

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must maintain and, upon request, provide the Department with a certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each coating used at the facility. In addition, purchase, usage, or production records of the coating material must be maintained.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-7: Compliance Demonstration
Effective between the dates of 10/13/2021 and 01/23/2029

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Replaces Condition(s) 12

Item 1-7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Item 1-7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Surface Coating - Handling, storage and disposal
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable Federal Requirement:6 NYCRR 228-1.3 (d)**Item 14.1:**

This Condition applies to Emission Unit: A-00001

Item 14.2:

Within the work area(s) associated with a coating line, the owner or operator of a facility must:

- (1) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
 - (i) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

**Condition 1-6: Natural gas fired VOC incineration control device
efficiency and seasonal shut down.
Effective between the dates of 10/13/2021 and 01/23/2029**

Applicable Federal Requirement:6 NYCRR 228-1.5 (b)**Replaces Condition(s) 15****Item 1-6.1:**

This Condition applies to Emission Unit: A-00001

Item 1-6.2:

Any VOC incinerator used as control equipment must be designed and operated to provide, at a minimum, a 90 percent overall removal efficiency. The Department may allow an owner or operator of a facility which uses a natural gas fired VOC incinerator as a control device for coating lines subject to 6 NYCRR Subpart 228-1 to shut down the VOC incinerator from November 1st through March 31st for the purposes of natural gas conservation provided that the Department has determined that this action will not jeopardize air quality.

Condition 16: Compliance Demonstration
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable Federal Requirement:6 NYCRR 228-1.6 (a)

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Reference Test Method: EPA Reference Test Method 311 or 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable Federal Requirement:6 NYCRR 228-1.6 (h)

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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 20: Contaminant List
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable State Requirement:ECL 19-0301

Item 20.1:

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

CAS No: 000078-93-3
Name: METHYL ETHYL KETONE

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 0NY075-00-0
Name: PARTICULATES

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

CAS No: 0NY998-00-0

Name: VOC

Condition 1-8: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 10/13/2021 and 01/23/2029

Applicable State Requirement:6 NYCRR 201-1.4

Replaces Condition(s) 21

Item 1-8.1:

(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 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 22: Emission Unit Definition
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 22.1(From Mod 1):

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

Emission Unit: A-00001

Emission Unit Description:

The emission unit consists of three (3) rotogravure coating lines (identified as 3B7, 4B8-1 and 4B8-2) and a mixing room. The coating lines and mixing room exhaust to a regenerative thermal oxidizer. When VOC compliant coatings are used, coating line exhaust is allowed to bypass the oxidizer. Each coating line is equipped with a switch to vent the coating line directly to the outside.

Building(s): 001

Condition 23: Renewal deadlines for state facility permits
Effective between the dates of 01/24/2019 and 01/23/2029

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

Item 23.1:

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 1-9: CLCPA Applicability
Effective between the dates of 10/13/2021 and 01/23/2029

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

Item 1-9.1:

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 24: Compliance Demonstration
Effective between the dates of 01/24/2019 and 01/23/2029

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

Item 24.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 24.2:

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: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 7: Air pollution prohibited
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable State Requirement:6 NYCRR 211.1

Item 7.1:

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 26: Emission Point Definition By Emission Unit
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 26.1(From Mod 1):

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

Emission Unit: A-00001			
Emission Point: 00100			
Height (ft.): 36	Diameter (in.): 32		
NYTMN (km.): 4582.36	NYTME (km.): 618.85	Building: 001	
Emission Point: 00101			
Height (ft.): 36	Diameter (in.): 32		
NYTMN (km.): 4582.36	NYTME (km.): 618.85	Building: 001	
Emission Point: 00102			
Height (ft.): 21	Diameter (in.): 16		
NYTMN (km.): 4582.38	NYTME (km.): 618.84	Building: 001	
Emission Point: 00103			
Height (ft.): 21	Diameter (in.): 12		
NYTMN (km.): 4582.37	NYTME (km.): 618.85	Building: 001	

Emission Point: 00104
 Height (ft.): 30 Diameter (in.): 48
 NYTMN (km.): 4582.37 NYTME (km.): 618.86 Building: 001

Condition 27: Process Definition By Emission Unit
Effective between the dates of 01/24/2019 and 01/23/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 27.1(From Mod 1):

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

Emission Unit: A-00001
 Process: AOA Source Classification Code: 4-02-022-01
 Process Description:
 This process consists of the application of coating to a plastic film substrate. The combined exhaust from the coating lines enter a regenerative thermal oxidizer.

Emission Source/Control: 00001 - Control
 Control Type: THERMAL OXIDATION

Emission Source/Control: 00002 - Process

Emission Source/Control: 00003 - Process

Emission Source/Control: 00004 - Process

Item 27.2(From Mod 1):

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

Emission Unit: A-00001
 Process: AOB Source Classification Code: 4-02-022-01
 Process Description:
 This process consists of the application of VOC compliant coatings to a plastic film substrate. The exhaust is vented directly to the outside.

Emission Source/Control: 00002 - Process

Emission Source/Control: 00003 - Process

Emission Source/Control: 00004 - Process

Item 27.3(From Mod 1):

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

Emission Unit: A-00001
 Process: AOC Source Classification Code: 4-02-022-03
 Process Description:
 This is a mixing process. Chemicals are added together, mixed, and used on one of the coaters. The exhaust is from four mixing hoods and one dye exhaust hood. The exhaust is sent to the regenerative thermal oxidizer, but

can go directly to the outside to avoid a buildup of fumes during a power outage.

Emission Source/Control: 00001 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00005 - Process

