

Facility DEC ID: 7032800080

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 7-0328-00080/00001
Effective Date: 07/09/2021 Expiration Date: 07/08/2031

Permit Issued To: Trivium Packaging US Inc
379 Broome Corporate Pkwy
Conklin, NY 13748

Facility: Trivium Packaging US Inc
379 BROOME CORPORATE PKWY
CONKLIN, NY 13748

Contact: Mark Lasewicz
Trivium Packaging USA Inc
379 Broome Corporate Pkwy
Conklin, NY 13748
(607) 584-3302

Description:

Trivium Packaging US Inc., seeks to use lacquer score repair on Line 1 in addition to current use on Line 2 as well as use oil score on Line 2 in addition to current use on Line 1. They also seek to use coil fed metal as opposed to sheet fed for ease of operation.

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: JONATHAN J STERCHO
NYS DEC Region 7
615 Eire Blvd W
Syracuse, NY 13204-2400

Authorized Signature: _____ Date: ___ / ___ / ___

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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.

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- 4 2 Relationship of this Permit to Other Department Orders and Determinations
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- 5 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 5 5 Submission of application for permit modification or renewal-REGION 7 HEADQUARTERS

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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.

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

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 7 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 7 Headquarters
Division of Environmental Permits
615 Erie Blvd West
Syracuse, NY 13204-2400
(315) 426-7400

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: Trivium Packaging US Inc
379 Broome Corporate Pkwy
Conklin, NY 13748

Facility: Trivium Packaging US Inc
379 BROOME CORPORATE PKWY
CONKLIN, NY 13748

Authorized Activity By Standard Industrial Classification Code:
3411 - METAL CANS

Permit Effective Date: 07/09/2021

Permit Expiration Date: 07/08/2031

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EU=P-ROC01

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NOTE: * preceding the condition number indicates capping.

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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 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

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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.

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- 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

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Name: XYLENE, M, O & P MIXT.

Condition 4: Capping Monitoring Condition
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 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 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 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 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 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 4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000100-41-4	ETHYLBENZENE
CAS No: 000108-10-1	2-PENTANONE, 4-METHYL
CAS No: 000108-88-3	TOLUENE
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 0NY100-00-0	TOTAL HAP

Item 4.7:

Compliance Demonstration shall include the following monitoring:

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Capping: Yes

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

Monitoring Description:

1. Emissions of all hazardous air pollutants, including HAPs not listed in this condition, combined, shall not equal or exceed 24.9 tons in any 12 consecutive month period.
2. Verification of monthly and annual HAP emissions shall be determined using compliance demonstration methods acceptable to the DEC including, but not limited to, records of monthly coating, lubricant, and clean up materials used, and the most recent stack test results, looking forward.
3. The owner or operator 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.
4. On an annual basis, 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 sources 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 those threshold levels that would require the submission of an application for a title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: TOTAL HAP
 Upper Permit Limit: 24.9 tons per year
 Monitoring Frequency: MONTHLY
 Averaging Method: 12 MONTH AVERAGE - 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 5: Capping Monitoring Condition
Effective between the dates of 07/09/2021 and 07/08/2031

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Applicable Federal Requirement:6 NYCRR Subpart 201-7**Item 5.1:**

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
6 NYCRR 212-3.1

Item 5.2:

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

Item 5.3:

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

Item 5.4:

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

Item 5.5:

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

Item 5.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 5.7:

Compliance Demonstration shall include the following monitoring:

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

1. Emissions of volatile organic compounds shall not equal or exceed 49.8 tons in any 12 consecutive month

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period.

2. Verification of monthly and annual VOC emissions shall be determined using compliance demonstration methods acceptable to the DEC including, but not limited to, records of monthly coating, lubricant, and clean up materials used, and the most recent stack test results, looking forward.

3. The owner or operator 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.

4. On an annual basis, 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 sources 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 those threshold levels that would require the submission of an application for a title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: VOC

Upper Permit Limit: 49.8 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - 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 6: Capping Monitoring Condition
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 6.1:

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

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6 NYCRR Subpart 201-6

Item 6.2:

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

Item 6.3:

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

Item 6.4:

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

Item 6.5:

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

Item 6.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000100-41-4	ETHYLBENZENE
CAS No: 000108-10-1	2-PENTANONE, 4-METHYL
CAS No: 000108-88-3	TOLUENE
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.

Item 6.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1. Emissions of each individual hazardous air pollutant, including HAPs not listed in this condition, shall not equal or exceed 9.9 tons in any 12 consecutive month period.
2. Verification of monthly and annual HAP emissions shall be determined using compliance demonstration methods acceptable to the DEC including, but not limited to,

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records of monthly coating, lubricant, and clean up materials used, and the most recent stack test results, looking forward.

3. The owner or operator 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.

4. On an annual basis, 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 sources 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 those threshold levels that would require the submission of an application for a title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: XYLENE, M, O & P MIXT.

Upper Permit Limit: 9.9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - 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 7: Visible Emissions Limited
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable Federal Requirement:6 NYCRR 211.2

Item 7.1:

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 07/09/2021 and 07/08/2031

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

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Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA RM 9

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Once in always in

Effective between the dates of 07/09/2021 and 07/08/2031

Applicable Federal Requirement:6 NYCRR 228-1.1 (a) (3)

Item 9.1:

Any coating line that is or becomes subject to the provisions of Subpart 228-1 will remain subject to these provisions even if the annual potential to emit or actual emissions of VOCs for the facility later falls below the thresholds set forth in Subdivision 228-1.1(a).

Condition 10: Compliance Demonstration

Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 10.2:

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 6 NYCRR Part 228.

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Compliance shall be determined using EPA Reference Method 9 upon request of the Department.

Parameter Monitored: OPACITY
 Upper Permit Limit: 20 percent
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
 Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 11: Surface Coating- Prohibitions
 Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 11.1:

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

- (i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;
- (ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and
- (iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Condition 12: Compliance Demonstration
 Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 12.1:

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

Emission Unit: P-ROC01
 Process: 003

Emission Unit: P-ROC01

Permit ID: 7-0328-00080/00001

Facility DEC ID: 7032800080

Process: 005

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- (a) 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;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) 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;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: VOC Content of Gas Stream - Test Methods
Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 13.1:

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The owner and/or operator of a surface coating line must follow the applicable notification requirements, protocol requirements, and test procedures of 6 NYCRR Part 202 for testing and monitoring. Depending on the conditions at the test site, one of the following test methods from Appendix A of 40 CFR Part 60 must be used when measuring the VOC content of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

- (1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;
- (2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or
- (3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

When the sampling and analysis methods required by this condition are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the Department.

Condition 14: Compliance Demonstration
Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 14.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:
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

**** Emission Unit Level ****

Condition 15: Compliance Demonstration
Effective between the dates of 07/09/2021 and 07/08/2031

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

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Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-ROC01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 15.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The control of particulate emissions released from new and modified process emission sources. Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

- (1) No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.
- (2) Compliance is determined using EPA Method 5 in accordance with a protocol approved by the DEC and 202-1. Testing shall be conducted upon the request of the DEC.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: Compliance Demonstration

Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-ROC01

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Item 16.2:

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 17: Compliance Demonstration
Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-ROC01

Item 17.2:

Compliance Demonstration shall include the following monitoring:

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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 18: Overall Removal Efficiency
Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 18.1:

This Condition applies to Emission Unit: P-ROC01

Item 18.2:

When an owner and/or operator of a coating line utilizes control equipment to comply with permit requirements or regulations, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

- (1) The overall removal efficiency may be made by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment.
- (2) For any control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment. The approved VOC CE test methods are contained Part 228-1.6(d)(2) Table 'Approved VOC CE Test Methods'. Test methods 204 through 204F (M204 - M204F) are included in Appendix M of 40 CFR part 51 (see table 1, Section 200.9 of this Title). When the sampling and analysis methods by this paragraph are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.
- (3) Alternative CE protocols and test methods may be allowed if the data quality objective approach or lower confidence limit approach requirements are met in conjunction with the additional criteria set forth in the EPA guidance document entitled Guidelines for Determining Capture Efficiency (see table 1, Section 200.9 of Title III). The alternative CE protocols and test methods must be approved in advance by the department. Also, the multiple line testing

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procedures outlined in the above guidance document can be used to determine CE if the applicable criteria are satisfied. The multiple line testing CE protocols and test methods must be approved in advance by the department.

Condition 19: Compliance Demonstration
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable Federal Requirement: 6 NYCRR 228-1.5 (b)

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-ROC01 Emission Point: EP001

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

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

- 1) The facility may use non-compliant lacquer coatings for score repair on Lines 1 and/or 2.
- 2) The use of coatings that exceed the VOC content limits (as applied) specified in 6 NYCRR 228-1.4 is prohibited unless control equipment is installed and operated. This condition is only applicable if non-228-1.4 compliant coatings are used.
- 3) Each VOC incinerator used as control equipment must be designed and operated to provide, at a minimum, a 90 percent overall removal efficiency.
- 4) Pursuant to 6 NYCRR Part 228-1.6(f), the owner/operator shall install, periodically calibrate and operate a continuous exhaust gas temperature monitor. The exhaust gas temperature shall be greater than the minimum outlet gas temperature (3 hour block average) demonstrated to achieve 90 percent capture and control during the most recent performance stack test.
- 5) Emissions testing must be conducted in accordance with a protocol approved by the Department and 6 NYCRR 202-1. Owner/operator must conduct testing within one year of permit issuance and there after, once every five years or at any other time required by the Department.

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- 6) A final test report shall be submitted to the Department no later than 60 days after completing the test.

Parameter Monitored: VOC
Lower Permit Limit: 90 percent by weight
Reference Test Method: EPA Methods 25a and 204 or equivalent
Monitoring Frequency: Once every five years
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 20: Compliance Demonstration
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable Federal Requirement: 6 NYCRR 228-1.4 (d) (2)

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-ROC01 Emission Point: EP001
Process: 005

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

Item 20.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- 1) Both Lines 1 and 2 may apply an oil score repair. This coating shall not contain VOC in excess of 4.2 pounds VOC/gallon of coating less water and exempt VOC's.
- 2) Compliance shall be determined using either manufacturer formulation data or Method 24 or equivalent.
- 3) Facility shall maintain records demonstrating compliance with this condition and provide to the Department upon request.

Parameter Monitored: VOC CONTENT
Upper Permit Limit: 4.2 pounds per gallon
Monitoring Frequency: ANNUALLY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)

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Reports due 0 days after the reporting period.
The initial report is due 12/31/2021.
Subsequent reports are due every 12 calendar month(s).

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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

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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 21: Contaminant List

Effective between the dates of 07/09/2021 and 07/08/2031

Applicable State Requirement: ECL 19-0301

Item 21.1:

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

CAS No: 000100-41-4
Name: ETHYLBENZENE

CAS No: 000108-10-1
Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-88-3

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Name: TOLUENE

CAS No: 001330-20-7

Name: XYLENE, M, O & P MIXT.

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 22: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable State Requirement:6 NYCRR 201-1.4

Item 22.1:

(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

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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 23: Emission Unit Definition
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 23.1:

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

Emission Unit: P-ROC01

Emission Unit Description:

The emission unit consists of 2 EZ Open can end lines and three (3) sanitary can end lines. These can end lines will produce metal can ends for a variety of packaging products, including food items.

Lines 1 and 2 are EZ Open can end lines, and include:

- A crown shell press;
- A liner seal compound applicator and dryer;
- A conversion press;
- A score repair operation;
- Score repair coating dryer; and,
- Packaging.

The crown seal press converts coated metal stock into "shells". After the shells are formed a water-based seal compound is applied to the "curl" of the shell. This compound forms a "gasket" when the end is attached to the can. The water-based material is dried in an induction dryer. The only emissions from this operation are water and ammonia.

In the conversion press a score is created in the can end and a pull tab is affixed. A lubricant is applied during the manufacture of the pull tab.

In order to protect the can end from corrosion in the area of the score, a repair coating is applied to the score area. The score repair coating is either an oil or a lacquer material. For operation flexibility, both EZ open can end lines will be capable of applying both an oil-based and a lacquer score repair. The oil-based score repair is a Subpart 228-1 compliant coating, while the lacquer score does not meet the 228-1 VOC content limit of 4.2 lb/gal. VOC emissions from the lacquer score repair application and drying will be exhausted to the RTO. From the score lacquer application, the can ends pass through

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drying ovens, are cooled and packaged. From the oil score repair application, can ends pass directly into a packaging area. Airless spray application equipment will be used to apply the score repair coatings.

The three (3) sanitary can end lines include the following operations:

- A mult-die shell press;
- A liner seal compound applicator and dryer;
- Testing; and
- Packaging

The sanitary end lines involve the application of the liner seal compound which results in ammonia and water emissions that are released into the plant.

Building(s): Building 1

Condition 24: Renewal deadlines for state facility permits
Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 24.1:

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 25: CLCPA Applicability
Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 25.1:

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 26: Compliance Demonstration
Effective between the dates of 07/09/2021 and 07/08/2031

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

Item 26.1:

The Compliance Demonstration activity will be performed for the Facility.

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Item 26.2:

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 7
615 Erie Blvd West
Syracuse, NY 13204

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 27: Compliance Demonstration
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable State Requirement: 6 NYCRR 201-5.4

Item 27.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator may install a new general process emission source, or modify an existing general process emission source, provided that all of the following conditions are met:

1. The owner or operator must identify all potential contaminants that could be emitted, including High Toxicity Air Contaminants, A-rated contaminants, hazardous air pollutants, VOCs, and non-VOC contaminants.
2. The device will not result in the emission of any High Toxicity Air Contaminant as defined in 6 NYCRR 212-2.2, Table 2.
3. The device will not result in the emission of any A-rated contaminant. A-rated contaminants are those contaminants listed with a “high” toxicity in the DEC’s

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most recent DAR-1 guidance document, and any other contaminants that may be A-rated by the Department.

4. The device will not result in the emission of any non-VOC contaminant, not given an A-rating, with an emission rate potential equal to or greater than 10 pounds per hour. For major sources, the device shall not result in the emission of VOCs with an emission rate potential of 3.0 pounds per hour or more.

5. The device shall not emit particulate in excess of 0.05 gr/dscf.

6. The device shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater, except only the emission of uncombined water.

7. A facility-wide air guide analysis must be completed using the DEC's DAR-1 guidance and demonstrate that there are no predicted off-site ambient concentrations in excess of the Annual Guideline Concentration (AGC) and short-term guideline concentration (SGC).

8. If the installation or modification results in the emission of any air contaminant not previously authorized or emitted in accordance with this permit, or if the installation or modification results in an increase in the emission rate potential of a contaminant emitted at the facility, or if the change involves the installation or alteration of any air cleaning installation device or control equipment, the owner or operator shall submit to the DEC a notice of the intent to install or modify such source. Such notice shall be submitted no later than 30 days prior to the proposed installation.

9. The DEC reserves the right to require a permit modification to impose special conditions if DEC determines the proposed change may have a significant air quality impact. In such cases, upon receipt of any notice submitted by the owner or operator to the DEC as required in this permit, the DEC will respond in 15 days of receipt of such notice, and may require that the owner or operator not undertake the proposed change without a permit modification.

10. No facility-wide emissions cap, or source-specific cap, stated in this permit, shall be exceeded.

11. The installation does not render the facility subject

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to any additional regulations or requirements.

12. The owner or operator must physically label each emission point.

13. The proposed change does not cause emissions to exceed any emission limit contained in regulations or applicable requirements;

14. The proposed installation or modification is not a modification under Title I of the Clean Air Act; and

15. A summary of all activities conducted under this operational flexibility condition shall be reported to the DEC in the facility's annual compliance report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 28: Air pollution prohibited
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable State Requirement:6 NYCRR 211.1

Item 28.1:

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 29: Compliance Demonstration
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable State Requirement:6 NYCRR 212-2.1

Item 29.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

1. The owner or operator shall not cause or allow the emission of any High Toxicity Air Contaminant from process

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emission sources. For those contaminants in 6 NYCRR 212-2.2 Table 2 with no stated Mass Emission Limit, no amount of such contaminant is allowed to be emitted.

2. For contaminants not listed on 6 NYCRR 212-2.2, Table 2, the owner or operator shall not emit, from any process emission source or any process emission source emission point, any contaminant with an Environmental Rating of A. For this permit, an A-rated contaminant is one which DEC has assigned a High Toxicity in the DEC's DAR-1 Guidance, unless otherwise assigned by the DEC. See https://www.dec.ny.gov/docs/air_pdf/dar1.pdf.

3. For processes 1, 2 and 4, the owner or operator shall not cause or allow the Emission Rate Potential of any air contaminant with an Environmental Rating of B or C equal to or greater than 10 pounds per hour per source. For this permit, a B-rated contaminant is one which DEC has assigned a Moderate Toxicity in the DEC's DAR-1 Guidance, and a C-rated contaminant is one in which DEC has assigned a Low Toxicity in the DEC's DAR-1 guidance, unless otherwise assigned by the DEC.

4. The owner or operator shall not cause or allow the emission of any air contaminant at a rate that would result in predicted ambient impacts in excess of its short-term (1 hour) or annual guideline concentration, unless otherwise approved by the DEC.

5. Compliance shall be based on stack emissions testing, a mass balance calculation, and/or ambient dispersion modeling conducted in accordance with a protocol approved by the DEC.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Condition 30: Emission Point Definition By Emission Unit
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 30.1:

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

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Emission Unit: P-ROC01

Emission Point: EP001

Height (ft.): 48 Diameter (in.): 28
NYTMN (km.): 4656.638 NYTME (km.): 432.216 Building: Building 1

Emission Point: FUGEP

Height (ft.): 30 Length (in.): Width (in.):
NYTMN (km.): 4656.638 NYTME (km.): 432.216 Building: Building 1

Condition 31: Process Definition By Emission Unit
Effective between the dates of 07/09/2021 and 07/08/2031

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 31.1:

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

Emission Unit: P-ROC01

Process: 001 Source Classification Code: 4-02-888-01

Process Description:

Lines 1, 2, 4, 5, and 6 utilize shell presses to form the can end shell. After the shell is formed a liner compound is applied to the curl of the shell. The liner compound is a water-based material with no VOC. The liner compound contains a maximum of 1 percent by weight of ammonia. After the liner compound is applied, the shell passes through an induction oven where the compound is dried. There are no cure volatiles released, but the drying releases ammonia. The ammonia is released as fugitive emissions into the plant. The emission sources are subject to 6 NYCRR Part 212.

Emission Source/Control: LINE1 - Process

Emission Source/Control: LINE2 - Process

Emission Source/Control: LINE4 - Process

Emission Source/Control: LINE5 - Process

Emission Source/Control: LINE6 - Process

Item 31.2:

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

Emission Unit: P-ROC01

Process: 002 Source Classification Code: 4-01-888-01

Process Description:

Can end Lines 1 and 2 apply a tab lubricant to facilitate

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the formation of the tab. VOC emissions from the lubricants are released as fugitive emissions into the plant. The lubricants contain no HAPS. The emission sources are subject to 6 NYCRR Part 212.

Emission Source/Control: LINE1 - Process

Emission Source/Control: LINE2 - Process

Item 31.3:

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

Emission Unit: P-ROC01

Process: 003

Source Classification Code: 4-02-017-99

Process Description:

Can end Lines 1 and 2 apply a score repair to the score area to prevent corrosion of the can end. The score repair compound is applied in a fine stream by hydraulic pressure. There is no air atomization.

Process 003 is for the application of a lacquer for score repair. After the lacquer is applied to the score on these lines, the can ends proceed to natural gas fired ovens where the lacquer is dried. Exhaust from the score repair application area and from the ovens is routed to an RTO for destruction. The emission sources are subject to 6 NYCRR Part 228-1.

Emission Source/Control: RTO01 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: LINE1 - Process

Emission Source/Control: LINE2 - Process

Item 31.4:

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

Emission Unit: P-ROC01

Process: 004

Source Classification Code: 4-02-017-05

Process Description:

Clean-up solvent is used to remove excess score repair compound from the score repair application areas. Emissions are exhausted as fugitive contaminants to the plant. The emission sources are subject to 6 NYCRR Part 228-1 (VOC solvents that are used for surface preparation, cleanup, or coating removal).

Emission Source/Control: LINE1 - Process

Emission Source/Control: LINE2 - Process

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Item 31.5:

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

Emission Unit: P-ROC01

Process: 005

Source Classification Code: 4-02-017-99

Process Description:

Can-end Lines 1 and 2 apply a score repair to the score area to prevent corrosion of the can end. The score repair is applied in a fine stream by hydraulic pressure. There is no air atomization.

Both lines may apply an oil score repair in which case the can ends proceed directly from the score repair to packaging. This process is subject to 6 NYCRR Part 228-1, and involves the application of a compliant coating meeting the VOC content limit in Part 228-1, ie: 4.2 pounds of VOC per gallon.

Emission Source/Control: LINE1 - Process

Emission Source/Control: LINE2 - Process

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