

Facility DEC ID: 735500021

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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 7-3550-00021/00050  
Effective Date: 07/13/2023 Expiration Date: 07/12/2033

Permit Issued To: FELIX SCHOELLER NORTH AMERICA, INC.  
BOX 250 CENTERVILLE RD  
179 CO RTE 2A  
PULASKI, NY 13142-0250

Contact: Andy Clements  
179 Co Rte 2A  
Pulaski, NY 13142  
(315) 298-5133

Facility: FELIX SCHOELLER NORTH AMERICA, INC.  
179 CO RTE 2A  
PULASKI, NY 13142-0250

Contact: Herman Jordal  
179 Co Rte 2A  
Pulaski, NY 13142  
(315) 298-8480

**Description:**

Felix Schoeller North America, Inc. is installing a coating machine at this location. The coating machine will manufacture a solvent based release liner, non-solvent release liner, and a photographic liner. The process will include ingredient mixing units, a coating machine, a corona treater with printing capabilities, an edge trimmer with cyclone pollution control, manual cloth cleaning, as well as a closed loop cooling circuit. While operating with the solvent based coatings, the coating machine will exhaust volatile organic compounds (VOC) to a regenerative thermal oxidizer (RTO) for VOC removal. The Facility currently operates a converting/sheeting operation to trim paper to size, package, and ship the finished product. Sanitary and process water is treated by and on-site wastewater treatment system, consisting of primary clarifiers, a biotower, and a lagoon. The Facility is limiting VOC emissions below 50 tons/year. There is no wastewater discharges associated with the coating line or RTO.

Facility DEC ID: 7355000021

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:       KEVIN M BALDUZZI  
                                      NYSDEC - REGION 7  
                                      5786 Widewaters Pkwy  
                                      SYRACUSE, NY 13214-1867

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_

Facility DEC ID: 7355000021

### Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

Facility DEC ID: 7355000021

**PAGE LOCATION OF CONDITIONS**

**PAGE**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

- 6 5 Submission of application for permit modification or renewal-REGION 7 HEADQUARTERS

Facility DEC ID: 7355000021

**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.

Facility DEC ID: 735500021

**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  
5786 Widewaters Parkway  
Syracuse, NY 13214-1867  
(315) 426-7400

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

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

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: FELIX SCHOELLER NORTH AMERICA, INC.  
BOX 250 CENTERVILLE RD  
179 CO RTE 2A  
PULASKI, NY 13142-0250

Facility: FELIX SCHOELLER NORTH AMERICA, INC.  
179 CO RTE 2A  
PULASKI, NY 13142-0250

Authorized Activity By Standard Industrial Classification Code:  
2672 - PAPER COATED AND LAMINATED, NEC

Permit Effective Date: 07/13/2023

Permit Expiration Date: 07/12/2033

**PAGE LOCATION OF CONDITIONS**

**PAGE**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 6 1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- 6 \*2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 8 3 6 NYCRR Subpart 202-1: Compliance Demonstration
- 9 4 6 NYCRR 211.2: Visible Emissions Limited
- 9 5 6 NYCRR Subpart 212-2: Compliance Demonstration
- 10 6 6 NYCRR 228-1.3 (b): Compliance Demonstration
- 10 7 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 12 8 6 NYCRR 228-1.4: Compliance Demonstration
- 13 9 6 NYCRR 228-1.6 (a): Compliance Demonstration
- 13 10 6 NYCRR 228-1.6 (c): Surface coating access for sampling
- 14 11 6 NYCRR 228-1.6 (d): Compliance Demonstration
- 15 12 6 NYCRR 228-1.6 (f): Compliance Demonstration
- 16 13 6 NYCRR 228-1.6 (g): Compliance Demonstration
- 16 14 6 NYCRR 228-1.6 (h): Compliance Demonstration

**Emission Unit Level**

**EU=1-COAT1**

- 17 15 6 NYCRR 228-1.5 (b): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 19 16 ECL 19-0301: Contaminant List
- 19 17 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 20 18 6 NYCRR Subpart 201-5: Emission Unit Definition
- 21 19 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 21 20 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 22 21 6 NYCRR 211.1: Air pollution prohibited

**Emission Unit Level**

- 22 22 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 23 23 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

**FEDERALLY ENFORCEABLE CONDITIONS**

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,

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

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**

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

**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)**

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

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: Facility Permissible Emissions**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

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

**Item 1.1:**

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

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

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

PTE: 97,200 pounds per year

**Condition 2: Capping Monitoring Condition**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

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

**Item 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 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 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

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

other state and federal air pollution control requirements, regulations or law.

**Item 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 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 2.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 2.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1. The facility will limit total VOC emissions from the regenerative thermal oxidizer (RTO), non-solvent release liner, wastewater treatment operations, and other combustion installations to below 49.9 tons per 12-month rolling basis.
2. The facility shall determine material usage on a monthly basis. Emissions from monthly material totals shall be calculated using emission factors for each material used (must also include: VOC destructed by control equipment, emissions from wastewater treatment and combustion sources). VOC emissions must be tracked on a 12-month rolling total. Emissions from exempt and trivial activities shall be included in the 12-month rolling totals. These records must be kept on site for five years.
3. Reports must be submitted to the NYSDEC on an annual basis, with a format acceptable to the NYSDEC. The annual report must document that the facility's VOC emissions, for each emission source (including exempt and trivial), over any consecutive 12-month period were below 49.9 tons. The report must also include information emission factors and other data used in calculating the monthly VOC

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

emissions. The owner or operator shall also submit a report no later than 30 days after emissions have exceeded this annual limit.

Parameter Monitored: VOC  
Upper Permit Limit: 49.9 tons per year  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2024.  
Subsequent reports are due every 12 calendar month(s).

**Condition 3: Compliance Demonstration**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

**Applicable Federal Requirement:6 NYCRR Subpart 202-1**

**Item 3.1:**  
The Compliance Demonstration activity will be performed for the Facility.

**Item 3.2:**  
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

For the purpose of ascertaining compliance or noncompliance with any air pollution control code, rule or regulation, the department may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions.

Unless otherwise specified in an applicable requirement or in a term or condition of the operating permit for the subject air contamination source, a person who is required by the department to submit a stack test report shall notify the department, in writing, not less than 30 days prior to the test, of the time and date of the test. Such notification shall also include the acceptable procedures to be used to stack test including sampling and analytical procedures. Such person shall allow a representative of the department, free access to observe stack testing being conducted by such person.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2024.

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

Subsequent reports are due every 12 calendar month(s).

**Condition 4: Visible Emissions Limited**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 4.1:**

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 5: Compliance Demonstration**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

**Applicable Federal Requirement:6 NYCRR Subpart 212-2**

**Item 5.1:**

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

Emission Unit: 1-COAT1  
Process: COA

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 5.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No 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.

Compliance will be determined through stack testing using EPA Method 5 upon start-up of the Regerative Thermal Oxidizer or request from the Department, in accordance with 6 NYCRR 202-1 and a protocol approved by the Department. The protocol must be submitted at least sixty (60) days prior to the testing date.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Reference Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: Arithmetic average of stack test runs

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 6: Compliance Demonstration**  
 Effective between the dates of 07/13/2023 and 07/12/2033

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

**Item 6.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 6.2:**

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: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 7: Compliance Demonstration**  
 Effective between the dates of 07/13/2023 and 07/12/2033

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



Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

**Item 7.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 7.2:**

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 Subpart 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.

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

**Applicable Federal Requirement:6 NYCRR 228-1.4**

**Item 8.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The owner or operator applying coatings to paper film and foil may not use coatings with VOC contents, as applied, which exceed 0.08 kg VOC/kg coating applied, except the coatings which are exhausted to the appropriate control equipment (i.e. Regerative Thermal Oxidizer). On an annual basis, the facility must submit the the NYSDEC, a statement of compliance with the specified limit and the following parameters:

1. The facility must maintain 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 must be maintained, in a format acceptable to the NYSDEC, for each coating material, including solvents.

Records must be kept on-site for a period of at least five (5) years and available to the NYSDEC's within 60 days of receipt of the request.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 0.08 kilograms VOC per kilogram as applied

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: ANNUALLY (CALENDAR)

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2024.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

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

**Item 9.1:**  
 The Compliance Demonstration activity will be performed for the Facility.

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

**Item 9.2:**  
 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2024.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 10: Surface coating access for sampling**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

**Applicable Federal Requirement:6 NYCRR 228-1.6 (c)**

**Item 10.1:**

Representatives of the department must be permitted on the facility owner's property, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with the requirements of 6 NYCRR Part 228-1.

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

**Condition 11: Compliance Demonstration**  
Effective between the dates of 07/13/2023 and 07/12/2033

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

**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

When an owner and/or operator of a coating line utilizes control equipment to comply with the provisions of 6 NYCRR Subpart 228-1, 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 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.

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 12: Compliance Demonstration**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

**Applicable Federal Requirement: 6 NYCRR 228-1.6 (f)**

**Item 12.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

For all air cleaning devices located at the facility, continuous monitors for the following parameters must be installed, periodically calibrated, and operated when the associated control equipment is operating:

- (1) exhaust gas temperature of all incinerators;
  - (2) temperature rise across catalytic incinerator bed (i.e. Regenerative Thermal Oxidizer);
  - (3) breakthrough of VOCs on a carbon adsorption unit;
- and
- (4) any other continuous monitoring or recording device required by the department.

The temperature in the oxidizer(s) must not fall more than 25 degrees Fahrenheit below the temperature recorded during the most recent department approved emissions test.

The averaging period is 1 hour. Temperature must be recorded in a data acquisition and handling system.

The facility must track and record all temperatures associated with the operating control equipment. Any information or record showing noncompliance with the requirements of this Part must be reported to the department within thirty (30) days following notice or generation of the information or record. The records must be kept on-site for a minimum of five (5) years and available upon department request.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 25 degrees F below the approved performance test combustion temperature

Monitoring Frequency: ANNUALLY

Averaging Method: 1-HOUR AVERAGE

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/11/2024 for the period 07/13/2023 through 07/12/2024

**Condition 13: Compliance Demonstration**

**Effective between the dates of 07/13/2023 and 07/12/2033**

**Applicable Federal Requirement:6 NYCRR 228-1.6 (g)**

**Item 13.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each emission differential (ED) calculation performed under section 228-1.5(d) of this Subpart, the owner or operator of the coating system must record the following and make the records available to the department upon request: the name or identification of each coating; the coating parameters used in equation 7, the individual ED values for each coating, and the ED value calculated for the coating system.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 14: Compliance Demonstration**

**Effective between the dates of 07/13/2023 and 07/12/2033**

**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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

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

**Condition 15: Compliance Demonstration**  
Effective between the dates of 07/13/2023 and 07/12/2033

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

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-COAT1

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

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The Facility must conduct performance testing within one hundred eighty (180) days after equipment startup, to demonstrate compliance with a VOC removal efficiency of 90% or greater. The Facility must submit a testing protocol to the department at least thirty (30) days prior to testing. Performance testing methods must be Department approved. Test results must be submitted to the Department for approval, within sixty (60) days of testing.

Lower Permit Limit: 90 percent

Reference Test Method: Department Approved Method

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

**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



Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

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 16: Contaminant List**

**Effective between the dates of 07/13/2023 and 07/12/2033**

**Applicable State Requirement:ECL 19-0301**

**Item 16.1:**

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

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

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

**Condition 17: Malfunctions and Start-up/Shutdown Activities**

**Effective between the dates of 07/13/2023 and 07/12/2033**

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

**Applicable State Requirement:6 NYCRR 201-1.4****Item 17.1:**

(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 18: Emission Unit Definition****Effective between the dates of 07/13/2023 and 07/12/2033****Applicable State Requirement:6 NYCRR Subpart 201-5****Item 18.1:**

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

Emission Unit: 1-COAT1

Emission Unit Description:

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

THIS EMISSION UNIT CONSISTS OF THE COATING MACHINE, WHICH CAN RUN ONLY ONE OF THE FOLLOWING PRODUCT GROUPS AT A TIME: SOLVENT RELEASE LINER, PHOTOGRAPHIC PAPER, AND NON-SOLVENT RELEASE LINER. EMISSION EXHAUSTED FROM THE SOLVENT BASED PROCESSES WILL BE CAPTURED AND DIRECTED TO AN REGENERATIVE THERMAL OXIDIZER (RTO).

Building(s): COAT

**Item 18.2:**

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

Emission Unit: 2-00WWT

Emission Unit Description:

THIS EMISSION UNIT INCLUDES THE WASTEWATER TREATMENT FACILITY, WHICH CONSISTS OF PRIMARY CLARIFIERS, A BIOTOWER, AND A LAGOON.

Building(s): WT906

**Item 18.3:**

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

Emission Unit: 3-00MIS

Emission Unit Description:

This operation collects and bales the paper trim from the cutting operations. A filter system is utilized as an emissions control for particulates.

Building(s): MAINBLDG

**Condition 19: Renewal deadlines for state facility permits**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

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

**Item 19.1:**

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 20: Compliance Demonstration**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

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

**Item 20.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 20.2:**

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

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

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2024.  
Subsequent reports are due every 12 calendar month(s).

**Condition 21: Air pollution prohibited**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 21.1:**

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 22: Emission Point Definition By Emission Unit**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

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

**Item 22.1:**

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

Emission Unit: 1-COAT1

Emission Point: C0002

Height (ft.): 32                      Diameter (in.): 16  
NYTMN (km.): 4823.2              NYTME (km.): 411.203      Building: COAT

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

Emission Point: C0003  
 Height (ft.): 32 Diameter (in.): 16  
 NYTMN (km.): 4823.166 NYTME (km.): 411.203 Building: COAT

Emission Point: C0004  
 Height (ft.): 32 Diameter (in.): 20  
 NYTMN (km.): 4823.166 NYTME (km.): 411.204 Building: COAT

Emission Point: C0005  
 Height (ft.): 32 Diameter (in.): 24  
 NYTMN (km.): 4823.166 NYTME (km.): 411.204 Building: COAT

Emission Point: C0006  
 Height (ft.): 50 Diameter (in.): 30  
 NYTMN (km.): 4823.2 NYTME (km.): 411.202 Building: COAT

Emission Point: C0007  
 Height (ft.): 32 Diameter (in.): 15  
 NYTMN (km.): 4823.189 NYTME (km.): 411.214 Building: COAT

**Item 22.2:**

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

Emission Unit: 3-00MIS

Emission Point: BL801  
 Height (ft.): 16 Diameter (in.): 16  
 NYTMN (km.): 4823.104 NYTME (km.): 411.084 Building: MAINBLDG

**Condition 23: Process Definition By Emission Unit**  
**Effective between the dates of 07/13/2023 and 07/12/2033**

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

**Item 23.1:**

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

Emission Unit: 1-COAT1  
 Process: COA Source Classification Code: 3-16-050-01  
 Process Description:  
 This process includes the mixing of specified products in two mixing units, a coating machine, and a corona treater with printing capabilities, an edge trimmer with cyclone, manual cloth cleaning, as well as a closed loop cooling circuit. Whole operating with solvent based coatings, the coating machine will exhaust emissions to a regenerative thermal oxidizer (RTO) for volatile organic compound (VOC) removal. The RTO has a thermal oil system to save heat and reduce emissions. the heater for the thermal oil system has a heat input of 10.45 MMBtu/hr.

Permit ID: 7-3550-00021/00050

Facility DEC ID: 7355000021

Emission Source/Control: THERM - Combustion  
Design Capacity: 2,500 kilowatts

Emission Source/Control: EDGEC - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: RTO01 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: COAT1 - Process

Emission Source/Control: CORTR - Process

Emission Source/Control: EDGE1 - Process

Emission Source/Control: NOSLV - Process

Emission Source/Control: PRINT - Process

**Item 23.2:**

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

Emission Unit: 2-00WWT

Process: 1WT

Source Classification Code: 4-02-820-01

Process Description:

The wastewater treatment unit consists of the on-site treatment of wastewater generated on-site. The treatment system consists of primary clarifiers, a biotower, and a lagoon.

Emission Source/Control: WT906 - Process

Emission Source/Control: WT907 - Process

Emission Source/Control: WT908 - Process

**Item 23.3:**

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

Emission Unit: 3-00MIS

Process: 3BL

Source Classification Code: 3-07-012-01

Process Description:

This unit consists of collecting and baling the paper trim from all cutting operations. Scrap from all cutting and trimming operations are directed and filtered in this process to the baler unit.

Emission Source/Control: BALEC - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: BALER - Process

**Permit ID: 7-3550-00021/00050**

**Facility DEC ID: 7355000021**

**Permit ID: 7-3550-00021/00050**

**Facility DEC ID: 7355000021**