



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-2626-00135/00002
Effective Date: 04/01/2015 Expiration Date: 03/31/2025

Permit Issued To: HAMMER PACKAGING CORP
200 LUCIUS GORDON DR
PO BOX 22678
ROCHESTER, NY 14692

Contact: HARTMUT L SWISHER
HAMMER PACKAGING CORP
200 LUCIUS GORDON DR PO BOX 22678
ROCHESTER, NY 14692
(585) 424-3880

Facility: HAMMER PACKAGING CORP
234 WALLACE WAY
ROCHESTER, NY

Description:

Air State Facility Permit for printing and coating operations at its Wallace Way facility, which prints product labels on film and converts pre-printed plastic shrink-wrap labels into packaging sleeves. To date, operations have been authorized by an air facility registration under which actual emissions of VOCs were required to be below half of regulatory threshold levels, or less than 5 TPY of VOC.

This permit authorizes an increase emissions of VOC above 5 TPY due to addition of a fifth seamer machine. Hammer Packaging has indicated that a film bonding process requires non-compliant coatings, and provided the Department with information sufficient to demonstrate that control technology is not technically or economically feasible, as specified in Part 228-1.5(e)(1).

The permit includes a proposed RACT variance from Part 228-1.3 for Surface Coating Processes which will require a federally enforceable limit of 10 TPY of actual emissions of VOC, and conditions under Part 234 for the printers.

New York State Department of Environmental Conservation
Facility DEC ID: 8262600135



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: KIMBERLY A MERCHANT
6274 EAST AVON-LIMA RD
AVON, NY 14414-9519

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

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



Condition 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 8 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 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(585) 226-2466

New York State Department of Environmental Conservation

Permit ID: 8-2626-00135/00002

Facility DEC ID: 8262600135



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: HAMMER PACKAGING CORP
200 LUCIUS GORDON DR
PO BOX 22678
ROCHESTER, NY 14692

Facility: HAMMER PACKAGING CORP
234 WALLACE WAY
ROCHESTER, NY

Authorized Activity By Standard Industrial Classification Code:
2752 - COMMERCIAL PRINTING LITHOGRAPH

Permit Effective Date: 04/01/2015

Permit Expiration Date: 03/31/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

EU=1-FLEXO

- 2 6 NYCRR 234.5: Compliance Demonstration
- 3 6 NYCRR 234.6: Compliance Demonstration
- 4 6 NYCRR 234.7: Compliance Demonstration
- 5 6 NYCRR 234.8: Compliance Demonstration

EU=1-SEAMR

- 6 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 7 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 8 6 NYCRR 228-1.5 (e): Compliance Demonstration
- 9 6 NYCRR 228-1.6 (a): Compliance Demonstration
- 10 6 NYCRR 228-1.6 (c): Surface coating access for sampling
- 11 6 NYCRR 228-1.6 (h): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 12 ECL 19-0301: Contaminant List
- 13 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 14 6 NYCRR Subpart 201-5: Emission Unit Definition
- 15 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 16 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 17 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 18 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 19 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.



(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Air pollution prohibited



Effective between the dates of 04/01/2015 and 03/31/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 1.1:

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 2: Compliance Demonstration
Effective between the dates of 04/01/2015 and 03/31/2025

Applicable Federal Requirement:6 NYCRR 234.5

Item 2.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FLEXO

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A person shall not sell, specify, or require the application of a coating, ink or adhesive on a substrate if such activity is prohibited by any of the provisions of this Part. The prohibition of this section shall apply to all written or oral contracts under the terms of which a coating, ink or adhesive is to be applied to a substrate.

This prohibition shall not apply to the following:

- (1) Ink, coating, or adhesive used in printing processes where control equipment has been installed to demonstrate compliance with this Part; or
- (2) Ink, coating, or adhesive used in printing processes that have been granted variances for reasons of technological and economic feasibility per section



234.3(f) of this Part.

A person selling an ink, coating, or adhesive used in a printing process subject to this Part must, upon request, provide the buyer with certification of the VOC content of the coating, ink or adhesive supplied.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: Compliance Demonstration
Effective between the dates of 04/01/2015 and 03/31/2025

Applicable Federal Requirement:6 NYCRR 234.6

Item 3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FLEXO

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

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility subject to this Part shall not:

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

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

(c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration
Effective between the dates of 04/01/2015 and 03/31/2025

Applicable Federal Requirement:6 NYCRR 234.7

New York State Department of Environmental Conservation

Permit ID: 8-2626-00135/00002

Facility DEC ID: 8262600135



Emission Unit: 1-FLEXO

Item 5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A person shall not cause or allow emissions having an average opacity of 10 percent or greater for any consecutive six minute period from any emission source subject to this Part into the outdoor atmosphere. The facility shall conduct a Method 9 observation upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Compliance Demonstration
Effective between the dates of 04/01/2015 and 03/31/2025

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

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SEAMR

Item 6.2:

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 this Subpart. The facility shall conduct a Method 9 observation upon request of the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)



Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Surface Coating - Handling, storage and disposal
Effective between the dates of 04/01/2015 and 03/31/2025

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

Item 7.1:

This Condition applies to Emission Unit: 1-SEAMR

Item 7.2:

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

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

Condition 8: Compliance Demonstration
Effective between the dates of 04/01/2015 and 03/31/2025



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

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SEAMR

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

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

A lesser degree of control has been established for this emission unit per 6 NYCRR Part 228-1.5(e). In order to maintain compliance with VOC Reasonably Available Control Technology (RACT) requirements contained in this section, the facility shall limit the total amount of VOCs emitted from Emission Unit 1-SEAMR to no more than ten tons per year (10 tpy) on a rolling twelve month basis. This RACT limit is established based upon an evaluation dated June 13, 2013.

Emissions subject to this RACT requirement shall be calculated using a combination of material usage and production records of material processed by the equipment. Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon request.

The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved RACT evaluation. The first re-evaluation will be due no later than five years from the date of issue of this permit.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Compliance Demonstration
Effective between the dates of 04/01/2015 and 03/31/2025

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

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SEAMR

Item 9.2:

Compliance Demonstration shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 8-2626-00135/00002

Facility DEC ID: 8262600135



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 10: Surface coating access for sampling
Effective between the dates of 04/01/2015 and 03/31/2025

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

Item 10.1:

This Condition applies to Emission Unit: 1-SEAMR

Item 10.2:

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.

Condition 11: Compliance Demonstration
Effective between the dates of 04/01/2015 and 03/31/2025

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

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SEAMR

Item 11.2:

Compliance Demonstration shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 8-2626-00135/00002

Facility DEC ID: 8262600135



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

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

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

Item B: 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 12: Contaminant List
Effective between the dates of 04/01/2015 and 03/31/2025



Applicable State Requirement:ECL 19-0301

Item 12.1:

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

CAS No: 0NY998-00-0

Name: VOC

**Condition 13: Malfunctions and start-up/shutdown activities
Effective between the dates of 04/01/2015 and 03/31/2025**

Applicable State Requirement:6 NYCRR 201-1.4

Item 13.1:

(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 malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, 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 stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and 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. 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, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the 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 14: Emission Unit Definition
Effective between the dates of 04/01/2015 and 03/31/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 14.1:

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

Emission Unit: 1-FLEXO

Emission Unit Description:

This emission unit consists of four web-fed flexographic printers, each with an associated corona treater. The printers are numbered 916, 1016, 1017 and 213.

Building(s): RTP

Item 14.2:

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

Emission Unit: 1-SEAMR

Emission Unit Description:

This emission unit consists of 5 seamers that convert pre-printed shrinkwrap labels into sleeves using a VOC-based solvent welding process (welding adhesives).

Building(s): RTP

Condition 15: Renewal deadlines for state facility permits
Effective between the dates of 04/01/2015 and 03/31/2025

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

Item 15.1:

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 16: Compliance Demonstration
Effective between the dates of 04/01/2015 and 03/31/2025

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

Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 16.2:

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

New York State Department of Environmental Conservation

Permit ID: 8-2626-00135/00002

Facility DEC ID: 8262600135



Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 8
6274 East Avon-Lima Rd.
Avon, NY 14414

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Visible Emissions Limited
Effective between the dates of 04/01/2015 and 03/31/2025

Applicable State Requirement:6 NYCRR 211.2

Item 17.1:

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.

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

Condition 18: Emission Point Definition By Emission Unit
Effective between the dates of 04/01/2015 and 03/31/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1:

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

Emission Unit: 1-FLEXO

Emission Point: FLX01

Height (ft.): 26 Diameter (in.): 18
NYTMN (km.): 4781.208 NYTME (km.): 276.824 Building: RTP

Emission Point: FLX02

Height (ft.): 33 Diameter (in.): 18
NYTMN (km.): 4781.208 NYTME (km.): 276.824 Building: RTP

Emission Point: FLX03

Height (ft.): 26 Diameter (in.): 14
NYTMN (km.): 4781.208 NYTME (km.): 276.824 Building: RTP

Emission Point: FLX04

Height (ft.): 26 Diameter (in.): 14
NYTMN (km.): 4781.208 NYTME (km.): 276.824 Building: RTP

Emission Point: FLX05

New York State Department of Environmental Conservation

Permit ID: 8-2626-00135/00002

Facility DEC ID: 8262600135



Height (ft.): 26 Diameter (in.): 6
NYTMN (km.): 4781.208 NYTME (km.): 276.824 Building: RTP

Emission Point: FLX06
Height (ft.): 34 Diameter (in.): 12
NYTMN (km.): 4781.208 NYTME (km.): 276.824 Building: RTP

Emission Point: FLX07
Height (ft.): 34 Diameter (in.): 8
NYTMN (km.): 4781.208 NYTME (km.): 276.824 Building: RTP

Emission Point: FLX08
Height (ft.): 34 Diameter (in.): 8
NYTMN (km.): 4781.208 NYTME (km.): 276.824 Building: RTP

Item 18.2:

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

Emission Unit: 1-SEAMR

Emission Point: SEAM1
Height (ft.): 33 Diameter (in.): 24
NYTMN (km.): 4781.208 NYTME (km.): 276.824 Building: RTP

Condition 19: Process Definition By Emission Unit
Effective between the dates of 04/01/2015 and 03/31/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1:

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

Emission Unit: 1-FLEXO
Process: FLX Source Classification Code: 4-05-003-01
Process Description:
This web-fed flexographic printing process includes emissions from inks, coatings, adhesives and cleaning solvents.

Emission Source/Control: 00213 - Process

Emission Source/Control: 00916 - Process

Emission Source/Control: 01016 - Process

Emission Source/Control: 01017 - Process

Item 19.2:

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

Emission Unit: 1-FLEXO
Process: OZO Source Classification Code: 4-05-003-01

New York State Department of Environmental Conservation

Permit ID: 8-2626-00135/00002

Facility DEC ID: 8262600135



Process Description:

This process includes the corona treatment of the substrates used in the flexographic printers. The corona treaters exhaust ozone.

Emission Source/Control: OC213 - Process

Emission Source/Control: C1016 - Process

Emission Source/Control: C1017 - Process

Emission Source/Control: OC916 - Process

Item 19.3:

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

Emission Unit: 1-SEAMR

Process: ADH

Source Classification Code: 4-02-007-10

Process Description:

Solvent adhesives are used to weld pre-printed labels into sleeves.

Emission Source/Control: SEAM1 - Process

Emission Source/Control: SEAM2 - Process

Emission Source/Control: SEAM3 - Process

Emission Source/Control: SEAM4 - Process

Emission Source/Control: SEAM5 - Process

