



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 8-3224-00108/00116
Effective Date: 08/28/2017 Expiration Date: 08/27/2022

Permit Issued To: PACTIV LLC
1900 WEST FIELD CT
LAKE FOREST, IL 60045

Contact: ROD KUCERA
PACTIV LLC
5250 NORTH ST
CANANDAIGUA, NY 14424

Facility: PACTIV LLC
5250 NORTH ST
CANANDAIGUA, NY 14424-1095

Contact: BRIAN R CHAPPELL
PACTIV LLC
5250 NORTH ST
CANANDAIGUA, NY 14424
(585) 393-3346

Description:
Permit to include renewal of Pactiv Corporation's Title V Facility Permit issued July 23, 2009 and modified May 27, 2010, for its Canandaigua Packaging Plant, one of two Title V Permits for Pactiv's Canandaigua operations. The two Pactiv facilities are considered to be under common control, therefore, major source thresholds are based on the addition of emissions from both facilities.

The Packaging Plant is a polystyrene foam production facility, which includes emission points for foam extrusion lines, extrusion line ovens, a pyrolysis oven for extruder die cleaning, a thermal densifier to collapse foam, silicone and plastic coating operations, and material and scrap handling systems. It includes two regenerative thermal oxidizers (RTO) for which the facility-level 40 CFR Part 64 Compliance Assurance Monitoring (CAM) is being carried over.

The Plant is subject to 6 NYCRR Part 201-6 (Title V) regulations due to emissions of volatile organic compounds (VOC) in excess of 50 tons per year (from both facilities).

Pactiv also seeks to maintain a 6 NYCRR Part 212 Volatile Organic Compound



(VOC) Reasonably Available Control Technology (RACT) variance granted by the Department previously. The variance allows operation of foam extruders, thermoforming operations, and foam roll storage without emission controls. The maintained variance is based on low concentrations of slowly released VOC, resulting in costs for emission control in significantly in excess of the Department's guideline level per ton of emissions controlled. Thermal oxidizer control equipment continues to be used for scrap material reclamation processes which release VOC foam expanding agent more rapidly. Total VOC emissions from the Packaging Plant sources will remain limited to 651 tons per year.

This application also proposes to continue the restriction of material throughput to 5 existing foam extrusion lines to restrict potential VOC emission levels from each line's processes, including scrap reclamation, to below the 40 ton per year threshold, per project, of 6 NYCRR Part 231 New Source Review in Ozone Transport Regions.

The renewal incorporates a previously approved operational flexibility change which included the installation of three new silicone clear coating operations on three Part 201 extrusion lines. The process uses 500 gallons of silicone clear coating. This change did not cause any exceedances in emission limitations, seek to establish or modify a federally-enforceable cap or cause the emissions to become subject to any additional regulations or requirements. In addition, exempt and trivial sources have been clarified, some source units have been reorganized, and some descriptions have been updated.

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 ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3

Permits are transferrable with the approval of the department unless specifically prohibited by



the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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

Item 4.1:

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

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

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

Condition 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: 8-3224-00108/00116

Facility DEC ID: 8322400108



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: PACTIV LLC
1900 WEST FIELD CT
LAKE FOREST, IL 60045

Facility: PACTIV LLC
5250 NORTH ST
CANANDAIGUA, NY 14424-1095

Authorized Activity By Standard Industrial Classification Code:
3086 - PLASTICS FOAM PRODUCTS
3089 - PLASTICS PRODUCTS, NEC

Permit Effective Date: 08/28/2017

Permit Expiration Date: 08/27/2022



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (a) (7): Fees
- 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 23 6 NYCRR 201-6.4 (f) (2): Compliance Certification
- 24 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 25 6 NYCRR 201-7.1: Facility Permissible Emissions
- *26 6 NYCRR 201-7.1: Capping Monitoring Condition
- *27 6 NYCRR 201-7.1: Capping Monitoring Condition
- 28 6 NYCRR 211.1: Air pollution prohibited
- 29 6 NYCRR 212-1.6 (a): Compliance Certification
- 30 6 NYCRR 212-2.1 (b): Compliance Certification
- 31 6 NYCRR 212-2.4 (b): Compliance Certification
- 32 6 NYCRR 228-1.3 (a): Compliance Certification
- 33 6 NYCRR 228-1.3 (b): Compliance Certification
- 34 6 NYCRR 228-1.3 (c): Compliance Certification
- 35 6 NYCRR 228-1.3 (d): Compliance Certification
- 36 6 NYCRR 228-1.3 (e): Compliance Certification
- 37 6 NYCRR 228-1.3 (e) (2): Compliance Certification
- 38 6 NYCRR 231-2.6: Compliance Certification
- 39 40CFR 63, Subpart ZZZZ: Compliance and Enforcement
- 40 40 CFR Part 64: Compliance Certification

Emission Unit Level

- 41 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 42 6 NYCRR Subpart 201-6: Process Definition By Emission Unit



EU=U-EMGEN

- 43 6 NYCRR 225-1.2 (g): Compliance Certification
- 44 6 NYCRR 227-1.3 (a): Compliance Certification

EU=U-FOAMS

- 45 6 NYCRR 212-3.1 (c) (4) (iii): Compliance Certification

EU=U-FOAMS,Proc=R01,ES=CT005

- 46 6 NYCRR 212-3.1 (c) (4) (i): Compliance Certification
- 47 6 NYCRR 212-3.1 (c) (4) (i): Compliance Certification

EU=U-FOAMS,Proc=R03,ES=CT004

- 48 6 NYCRR 212-3.1 (c) (4) (i): Compliance Certification
- 49 6 NYCRR 212-3.1 (c) (4) (i): Compliance Certification

EU=U-FOAMS,Proc=T01

- 50 6 NYCRR 229.3 (e) (2) (iv): VOL storage tanks from 10000 - 20000 gallons

EU=U-SILIC

- 51 6 NYCRR 228-1.1 (a) (3): Once in always in
- 52 6 NYCRR 228-1.4 (d) (3): Compliance Certification

EU=U-SURFA

- 53 6 NYCRR 228-1.1 (a) (3): Once in always in

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 54 ECL 19-0301: Contaminant List
- 55 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 56 6 NYCRR 212-2.3 (b): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (a) (4)

Owners and/or operators of facilities having an issued Title V 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.

Item C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and



reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: Property Rights - 6 NYCRR 201-6.4 (a) (6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: Severability - 6 NYCRR 201-6.4 (a) (9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item I: Permit Shield - 6 NYCRR 201-6.4 (g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V



facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item J: Reopening for Cause - 6 NYCRR 201-6.4 (i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of therequirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the department pursuant to the provisions of section 201- 6.6 of this Subpart.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

**Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 08/28/2017 and 08/27/2022**

Applicable Federal Requirement: 6 NYCRR 200.6

Item 1.1:

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.

Condition 2: Fees
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 3: Recordkeeping and Reporting of Compliance Monitoring
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (c)

Item 3.1:

The following information must be included in any required compliance monitoring records and reports:

(i) The date, place, and time of sampling or measurements;

(ii) The date(s) analyses were performed;

(iii)The company or entity that performed the analyses;

(iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;

(v) The results of such analyses including quality assurance data where required; and

(vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

Condition 4: Records of Monitoring, Sampling, and Measurement
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all



reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements,



the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual



report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 6: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as



specified in any special permit terms or conditions;
and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section
USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
NYSDEC Region 8 Headquarters
6274 East Avon-Lima Road
Avon, NY 14414-9519

The address for the BQA is as follows:

NYSDEC



New York State Department of Environmental Conservation

Permit ID: 8-3224-00108/00116

Facility DEC ID: 8322400108

Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires - Prohibitions
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 215.2



Item 9.1:

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all



Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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.

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 13.1:

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 08/28/2017 and 08/27/2022



Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 14.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 15: Requirement to Provide Information
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: Right to Inspect
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Off Permit Changes
Effective between the dates of 08/28/2017 and 08/27/2022



Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)

Item 17.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

Condition 18: Required Emissions Tests
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 18.1:

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

Condition 19: Accidental release provisions.
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:40 CFR Part 68

Item 19.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:



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1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 20: Recycling and Emissions Reduction
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:40CFR 82, Subpart F

Item 20.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 21: Emission Unit Definition
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 21.1:

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

Emission Unit: U-EMGEN

Emission Unit Description:

This unit contains emergency RICE units

Building(s): NPH
RMC
SPH

Item 21.2:

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

Emission Unit: U-FOAMS

Emission Unit Description:

This unit includes Polystyrene foam extrusion, roll storage, thermoforming processes and onsite finished goods storage including RMC.

Building(s): 1
2

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3
5
6
7
OUTSIDE
UST

Item 21.3:

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

Emission Unit: U-OPSEX

Emission Unit Description:

This unit include extrusion line ovens and packaging.

Building(s): 1
4

Item 21.4:

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

Emission Unit: U-PYROL

Emission Unit Description:

This unit includes die cleaning.

Building(s): 2
8-1

Item 21.5:

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

Emission Unit: U-SILIC

Emission Unit Description:

This unit includes silicone coating operations for the
OPS lines that are fugitive sources.

Building(s): 1
4
8-1

Item 21.6:

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

Emission Unit: U-SOLID

Emission Unit Description:

This unit includes solid and scrap material handling
operations.

Building(s): 1
2
3
6
BAGHOUSE
OUTSIDE
SILO

Item 21.7:

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

Emission Unit: U-SURFA

Emission Unit Description:

This unit includes plastic coating operations.

Building(s): 1

4

8-1

Condition 22: Progress Reports Due Semiannually
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)

Item 22.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 23: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (2)

Item 23.1:

The Compliance Certification activity will be performed for the Facility.

Item 23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

(1) Certain changes and modifications which meet the criteria under (i) - (iii) below may be conducted without prior approval of the Department and shall not require modification of the permit. The facility owner and/or operator must notify the department in writing at least 7 calendar days in advance of making the changes or modifications.

(i) changes that do not cause emissions to exceed any emission limitation contained in regulations or applicable requirements;

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(ii) changes which do not cause the subject emission unit, emission source, process, or emission point to become subject to any additional regulations or requirements;

(iii) changes that do not seek to establish or modify a federally-enforceable emission cap or limit.

(2) In addition to the record keeping required above, the permittee must notify the Department in writing at least 7 calendar days in advance of making changes involving:

(i) the installation or relocation of any emission source, process, or emission point within a facility;

(ii) the emission of any air pollutant not previously authorized or emitted in accordance with a permit issued by the Department;

(iii) the installation or alteration of any air cleaning installation, device or control equipment; or

(iv) the transition of an exclusively R&D process to a manufacturing process.

(3) The Department may require a permit modification, in order to impose new applicable requirements or special permit conditions if it determines that changes proposed pursuant to notification under (2) above do not meet the criteria under (1) or the change may have a significant air quality impact. In such cases the Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the potential air quality impacts and/or applicable requirements. The Department shall respond to the permittee in writing with such a determination. The Department's determination shall include a listing of information necessary to further review the proposed change.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 24: Non Applicable requirements
Effective between the dates of 08/28/2017 and 08/27/2022



Applicable Federal Requirement:6 NYCRR 201-6.4 (g)

Item 24.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6 NYCRR Subpart 227-1

Emission Unit: UFOAMS Process: R03

Reason: This is a process source and is therefore not subject to 6 NYCRR Part 227-1.

6 NYCRR Subpart 227-1

Emission Unit: UFOAMS Process: BAK

Reason: This is a process source and is therefore not subject to 6 NYCRR Part 227-1.

6 NYCRR Subpart 227-1

Emission Unit: UOPSEX Process: OPS

Reason: This is a process source and is therefore not subject to 6 NYCRR Part 227-1.

6 NYCRR Subpart 227-1

Emission Unit: UFOAMS Process: R01

Reason: This is a process source and is therefore not subject to 6 NYCRR Part 227-1.

6 NYCRR Subpart 227-2

Reason: This facility is not a major source of NO_x emissions, therefore no sources are subject to 6 NYCRR Part 227-2.

Condition 25: Facility Permissible Emissions

Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 25.1:

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

PTE: 1,302,000 pounds per year

Name: VOC

Condition 26: Capping Monitoring Condition

Effective between the dates of 08/28/2017 and 08/27/2022



Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 26.1:

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 26.2:

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

Item 26.3:

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

Item 26.4:

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 26.5:

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 26.6:

The Compliance Certification activity will be performed for the Facility.

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

Item 26.7:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:
Pactiv shall calculate and record emissions on a rolling 12-month basis to show that annual emissions of VOCs will not exceed 651 tons per year. Records of all facility VOC emissions, including VOC emissions from on-site warehousing of finished products, will be determined to

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prove that the annual emissions will not exceed 651 tons per year.

Mass balances, AP-42 emission factors, manufacturers data, stack tests or other credible sources shall be used to determine emissions on a monthly basis. All records shall be kept for a minimum of 5 years in a format acceptable to the department.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 651 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 27: Capping Monitoring Condition
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 27.1:

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 231-1.2

Item 27.2:

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

Item 27.3:

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

Item 27.4:

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 27.5:

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 27.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: ONY998-00-0 VOC

Item 27.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Process material throughput shall be limited as follows for the listed extruder lines:

Extruder Line 108 - 5562 tons per year of polystyrene foam.

Extruder Line 109 - 5562 tons per year of polystyrene foam.

Extruder Line 116 - 5562 tons per year of polystyrene foam.

Extruder Line 117 - 5562 tons per year of polystyrene foam.

The above limits shall ensure that no single proposed source project exceeds the 6 NYCRR Part 231 applicability level of 40 tons per year of VOC. VOC emissions will be calculated on a rolling 12-month basis and will include emissions from production and on-site warehousing of finished goods. Records of total throughput will be kept in a format acceptable to the department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: VOC's

Parameter Monitored: PLASTIC

Upper Permit Limit: 5562 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 28: Air pollution prohibited
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 211.1



Item 28.1:

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

Condition 29: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

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

Item 29.1:

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

Emission Unit: U-FOAMS
Process: BAK

Emission Unit: U-FOAMS
Process: R01

Emission Unit: U-FOAMS
Process: R03

Emission Unit: U-OPSEX
Process: OPS

Emission Unit: U-PYROL
Process: PYR

Emission Unit: U-SOLID

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

Item 29.2:

Compliance Certification 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 having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

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The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies monthly while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 30: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 212-2.1 (b)

Item 30.1:

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

Emission Unit: U-FOAMS

Emission Unit: U-OPSEX



Emission Unit: U-PYROL

Emission Unit: U-SOLID

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental rating assigned to the contaminant by the department.

The listed non-HTAC contaminants have been demonstrated to be in compliance with 6 NYCRR Part 212-2.1(b) by meeting either:

- 1- the degree of air cleaning required for the rating given to each contaminant, or
- 2- the NAAQS.

The facility owner or operator shall verify the parameters used to demonstrate compliance with Table 3 semi-annually.

These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer's or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating of any contaminant may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any unforeseen instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

At all times, the facility owner or operator must operate and maintain all process emission sources, including the

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associated air pollution control and monitoring equipment, in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Records of calculation reviews, observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the semi-annual compliance monitoring report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 31: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

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

Item 31.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-FOAMS

Process: BAK

Emission Unit: U-FOAMS

Process: R01

Emission Unit: U-FOAMS

Process: R03

Emission Unit: U-OPSEX

Process: OPS

Emission Unit: U-PYROL

Process: PYR

Emission Unit: U-SOLID

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 31.2:

Compliance Certification shall include the following monitoring:

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

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Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications semi-annually. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site and a summary will be included in the semi-annual monitoring reports. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: .05 grains per cubic foot

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 32: Compliance Certification



Effective between the dates of 08/28/2017 and 08/27/2022

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

Item 32.1:

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

Emission Unit: U-SILIC

Emission Unit: U-SURFA

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 32.2:

Compliance Certification 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 having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation. Opacity monitoring shall occur, at a minimum, once every month during typical operating conditions and shall be recorded.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department



determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

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

Item 33.1:

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

Emission Unit: U-SILIC

Emission Unit: U-SURFA

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(A) Except as provided for in paragraph (B) below, 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.

(B) Owners and operators of emission sources not subject to 6NYCRR Part 228-1 as set forth in section 228-1.1(b)(9) or (13), or those sources that are using coatings not subject to specific requirements of 6NYCRR Part 228-1 as set forth in section 228-1.3(e)(2), or section 228-1.4(b)(5)(iii)('e'), ('i') or ('iv'), must maintain records on an as used basis. The records must include the relevant regulatory citation of each exemption and quantity of coating used. If the exemption criteria are based on VOC usage, the records must contain calculations and supplier/manufacturer material data sheets for verification of VOC usage. All records required by this paragraph must be maintained at the facility for a period of five years.

(C) 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: SEMI-ANNUALLY (CALENDAR)

Reports due 90 days after the reporting period.

The initial report is due 3/31/2018.

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

Condition 34: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

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

Item 34.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-SILIC

Emission Unit: U-SURFA

Item 34.2:

Compliance Certification shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 35: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

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

Item 35.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-SILIC

Emission Unit: U-SURFA

Item 35.2:



Compliance Certification 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 36: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

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

Item 36.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-SILIC

Emission Unit: U-SURFA

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities operating coating lines must use one or more of the following application techniques to apply the coating:

- (i) flow/curtain coating;
- (ii) dip coating;
- (iii) cotton-tipped swab application;
- (iv) electro-deposition coating;
- (v) high volume low pressure spraying;
- (vi) electrostatic spray;
- (vii) airless spray, (including air assisted);
- (viii) airbrush application methods for stenciling, lettering, and other identification markings; or
- (ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 37: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 228-1.3 (e) (2)

Item 37.1:

The Compliance Certification activity will be performed for the Facility.

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility containing a coating line (other than a class A coating line) may use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits set forth in section 228-1.4 ; provided such use is recorded on an as used basis and maintained at the facility for a period of five years.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 38: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 231-2.6

Item 38.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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This facility has established 170.1 TPY of VOC emission reduction credits by over-controlling sources in Emission Unit U-FOAMS.

This credit required (1995-2010) the facility to maintain the control efficiencies as stated in this permit:

Process R01: 95% overall control efficiency, which includes all downtime (preventative maintenance or malfunction) and emissions from Process BAK Emission Sources CD-51 and CD-56.

Process R03: 90% overall control efficiency, which includes all downtime (preventative maintenance or malfunction) and emissions from Process BAK Emission Source RE100.

The overall control efficiency of the U-FOAMS control devices will be calculated in a manner acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 39: Compliance and Enforcement
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 39.1:

The Department has not accepted delegation of 40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Any questions concerning compliance and/or enforcement of this regulation should be referred to USEPA Region 2, 290 Broadway, 21st Floor, New York, NY 10007-1866; (212) 637-4080. Should the Department decide to accept delegation of 40 CFR Part 63 Subpart ZZZZ during the term of this permit, enforcement of this regulation will revert to the Department as of the effective date of delegation.

Condition 40: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022



Applicable Federal Requirement:40 CFR Part 64

Item 40.1:

The Compliance Certification activity will be performed for the Facility.

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility is subject to the Compliance Assurance Monitoring Rule (CAM Rule). Emission Unit U-Foams is subject to an emission limitation for VOC emissions, uses 2 regenerative thermal oxidizers to control VOC emissions and has potential pre-control emissions greater than 50 TPY for VOC emissions.

Monitoring conditions associated with the control of VOC emissions through the use of the 2 regenerative thermal oxidizers are subject to the CAM rule. The 2 regenerative thermal oxidizers are the Nestec (Control ID CT005) and the Crawford (CT004). Monitoring conditions contained within this Title V permit include the following:

- An indicator to be monitored to show compliance with the applicable emission limit or standard.
- The ranges or designated conditions for such indicators, or the process by which such indicators ranges or designed conditions will be established.
- the performance criteria for the monitoring stated above
- if applicable, the indicator ranges and performance criteria for a CEMS, COMS or PEMS (if used).

All future modification or renewal of this Title V Permit must include proposed monitoring conditions which are in compliance with the above criteria.

The compliance status for all emission limit monitoring parameters will be documented within the facility's Semi-Annual Monitoring Reports and Annual Compliance Certifications. Excursions trigger immediate inspection and corrective actions. Each Semi-Annual Monitoring Report and Annual Compliance Certification will document the number of excursions that occurred within the reporting period, duration, cause and corrective actions taken.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

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

Condition 41: Emission Point Definition By Emission Unit
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 41.1:

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

Emission Unit: U-EMGEN

Emission Point: EDF01
Height (ft.): 10 Diameter (in.): 6
NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: SPH

Emission Point: EDF02
Height (ft.): 16 Diameter (in.): 6
NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: NPH

Emission Point: EDF03
Height (ft.): 15 Diameter (in.): 10
NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: RMC

Emission Point: EDF04
Height (ft.): 15 Diameter (in.): 10
NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: RMC

Emission Point: ENG01
Height (ft.): 5 Diameter (in.): 3
NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: OUTSIDE

Item 41.2:

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

Emission Unit: U-FOAMS

Emission Point: CST01
Height (ft.): 12 Diameter (in.): 2
NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: UST

Emission Point: CST02
Height (ft.): 12 Diameter (in.): 2
NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: UST

Emission Point: CST03

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Height (ft.): 12	Diameter (in.): 2	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: UST
Emission Point: CST04		
Height (ft.): 12	Diameter (in.): 2	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: UST
Emission Point: CT004		
Height (ft.): 40	Diameter (in.): 12	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: OUTSIDE
Emission Point: EV001		
Height (ft.): 22	Diameter (in.): 36	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 6
Emission Point: UP100		
Height (ft.): 24	Diameter (in.): 23	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 6

Item 41.3:

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

Emission Unit: U-OPSEX		
Emission Point: OPS03		
Height (ft.): 36	Diameter (in.): 16	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 4
Emission Point: OPS12		
Height (ft.): 36	Length (in.): 20	Width (in.): 20
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 4

Item 41.4:

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

Emission Unit: U-PYROL		
Emission Point: BERRI		
Height (ft.): 12	Diameter (in.): 4	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 2

Item 41.5:

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

Emission Unit: U-SOLID		
Emission Point: CD-53		
Height (ft.): 28	Diameter (in.): 13	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 1
Emission Point: CD-54		
Height (ft.): 28	Diameter (in.): 13	

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NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 1
Emission Point: CR-01		
Height (ft.): 18	Diameter (in.): 20	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 1
Emission Point: CR-02		
Height (ft.): 25	Diameter (in.): 20	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 2
Emission Point: CR-03		
Height (ft.): 21	Diameter (in.): 20	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 3
Emission Point: CR-04		
Height (ft.): 21	Diameter (in.): 20	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: 6
Emission Point: CRT01		
Height (ft.): 5	Diameter (in.): 8	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: BAGHOUSE
Emission Point: CRT02		
Height (ft.): 1	Diameter (in.): 4	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: OUTSIDE
Emission Point: CS100		
Height (ft.): 1	Diameter (in.): 4	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: OUTSIDE
Emission Point: CS101		
Height (ft.): 40	Diameter (in.): 20	
NYTMN (km.): 4752.621	NYTME (km.): 312.229	Building: SILO
Emission Point: CS102		
Height (ft.): 40	Diameter (in.): 20	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: SILO
Emission Point: CS103		
Height (ft.): 40	Diameter (in.): 20	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: SILO
Emission Point: CS104		
Height (ft.): 40	Diameter (in.): 20	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: SILO
Emission Point: CS105		
Height (ft.): 40	Diameter (in.): 20	
NYTMN (km.): 4752.92	NYTME (km.): 312.125	Building: SILO
Emission Point: CS106		
Height (ft.): 40	Diameter (in.): 20	



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NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: SILO

Emission Point: CS201
 Height (ft.): 40 Diameter (in.): 20
 NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: SILO

Emission Point: CV-01
 Height (ft.): 18 Diameter (in.): 20
 NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: 1

Emission Point: CV-02
 Height (ft.): 25 Diameter (in.): 20
 NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: 2

Emission Point: CV-03
 Height (ft.): 21 Diameter (in.): 20
 NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: 3

Emission Point: CV-04
 Height (ft.): 21 Diameter (in.): 20
 NYTMN (km.): 4752.92 NYTME (km.): 312.125 Building: 6

Condition 42: Process Definition By Emission Unit
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 42.1:

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

Emission Unit: U-EMGEN
 Process: EXG Source Classification Code: 2-02-001-01
 Process Description:
 This process includes existing CI and SI emergency RICE
 subject to 40 CFR 63 Subpart ZZZZ.

Emission Source/Control: SDF01 - Combustion

Emission Source/Control: SDF02 - Combustion

Emission Source/Control: SDF03 - Combustion

Emission Source/Control: SDF04 - Combustion

Emission Source/Control: SNG01 - Combustion

Item 42.2:

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

Emission Unit: U-FOAMS
 Process: BAK Source Classification Code: 3-08-010-05
 Process Description:

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This process includes periodic RTO bakeout operations to remove oligomers and plastic residue in NESTEC and Crawford RTOs.

Emission Source/Control: CD-51 - Process

Emission Source/Control: CD-56 - Process

Emission Source/Control: RE100 - Process

Item 42.3:

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

Emission Unit: U-FOAMS

Process: EX1

Source Classification Code: 3-08-010-02

Process Description:

This process includes the foams extruders in numerous buildings that emit fugitive emissions.

Emission Source/Control: EX100 - Process

Item 42.4:

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

Emission Unit: U-FOAMS

Process: PCM

Source Classification Code: 4-05-005-99

Process Description:

This process includes the application of insignificant quantities of ink to plastic product for product counting purposes.

Emission Source/Control: DOT01 - Process

Item 42.5:

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

Emission Unit: U-FOAMS

Process: R01

Source Classification Code: 3-08-010-05

Process Description:

This process includes the reclaim extruder fluff feed bins and fluff silos fed from scrap foam grinders and thermoforming choppers. PM associated with this process is vented to a series of dust collectors. The dust collectors are then subsequently vented to the Nestec Regenerative Thermal Oxidizer CT005 to control the VOC emissions.

Emission Source/Control: CT005 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: CD-51 - Process

Emission Source/Control: CD-56 - Process

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Item 42.6:

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

Emission Unit: U-FOAMS

Process: R03

Source Classification Code: 3-08-010-05

Process Description:

This process includes all operations controlled via the Crawford RTO (CT004) as well as uncontrolled emissions from the underwater pelletizers. These operations include four reclaim extruders (lines 151,152,153 and 154) for FOAMS. When running OPS reclaim, this process is an exempt activity consistent with 6NYCRR Part 201-3.2(c)(36). The Crawford RTO (CT004) controls VOC emissions.

Emission Source/Control: CT004 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: RE100 - Process

Emission Source/Control: UP100 - Process

Item 42.7:

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

Emission Unit: U-FOAMS

Process: RST

Source Classification Code: 3-08-999-99

Process Description:

This process includes the foam roll storage operations.

Emission Source/Control: RSB05 - Process

Emission Source/Control: RSB07 - Process

Item 42.8:

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

Emission Unit: U-FOAMS

Process: T01

Source Classification Code: 4-07-016-07

Process Description:

This process includes the blowing agent underground storage tanks.

Emission Source/Control: TANK1 - Process

Emission Source/Control: TANK2 - Process

Emission Source/Control: TANK3 - Process

Emission Source/Control: TANK4 - Process

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Item 42.9:

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

Emission Unit: U-FOAMS

Process: TF1

Source Classification Code: 3-08-999-99

Process Description:

This process includes the foams thermoforming operations.

Emission Source/Control: TF100 - Process

Item 42.10:

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

Emission Unit: U-OPSEX

Process: OPS

Source Classification Code: 3-08-999-99

Process Description:

THIS PROCESS INCLUDES THE TWO OPS
EXTRUSION LINE OVENS AT THE FACILITY. THE
PRIMARY EMISSIONS ARE VOC AND HAP.

Emission Source/Control: OPS03 - Process

Emission Source/Control: OPS12 - Process

Item 42.11:

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

Emission Unit: U-OPSEX

Process: PCS

Source Classification Code: 4-05-005-99

Process Description:

This process includes the application of insignificant
quantities of ink to plastic product for product counting
purposes.

Emission Source/Control: UVS01 - Process

Item 42.12:

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

Emission Unit: U-PYROL

Process: PYR

Source Classification Code: 3-08-999-99

Process Description:

This process includes die cleaning operations to melt
residual plastic left in the extruder dies. There are
minor emissions of VOC, Particulate Matter, and HAP

Emission Source/Control: BERRI - Process

Emission Source/Control: MFDIE - Process

Item 42.13:



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

Emission Unit: U-SILIC
Process: SIL Source Classification Code: 4-02-022-01
Process Description:
This process includes silicone clear coating operations for the OPS and MFPP extrusion lines and thermoforming lines. Minor amounts of VOC are emitted from these fugitive sources.

- Emission Source/Control: 401SI - Process
- Emission Source/Control: 402SI - Process
- Emission Source/Control: SIL01 - Process
- Emission Source/Control: SIL02 - Process
- Emission Source/Control: SIL03 - Process
- Emission Source/Control: SIL04 - Process
- Emission Source/Control: SIL05 - Process
- Emission Source/Control: SIL06 - Process
- Emission Source/Control: SIL07 - Process
- Emission Source/Control: SIL08 - Process
- Emission Source/Control: SIL09 - Process
- Emission Source/Control: SIL10 - Process

Item 42.14:

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

Emission Unit: U-SOLID
Process: CR1 Source Classification Code: 3-08-999-99
Process Description:
This process includes the OPS polystyrene transfer system from railcar to unloader with associated fabric filter control. Resin is ultimately transferred from the unloader to silos that are equipped with a control device. The emissions of concern are particulate matter.

- Emission Source/Control: DCCR1 - Control
Control Type: FABRIC FILTER
- Emission Source/Control: CRT01 - Process

Item 42.15:



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

Emission Unit: U-SOLID
Process: CS1 Source Classification Code: 3-08-999-99
Process Description:
This process includes the polystyrene transfer system from railcar to unloader that is equipped with a control device. Resin is ultimately transferred to silos that are not equipped with a control device. The emissions of concern are particulate matter.

Emission Source/Control: DCCR2 - Control
Control Type: FABRIC FILTER

Emission Source/Control: DCCS1 - Control
Control Type: FABRIC FILTER

Emission Source/Control: CRT02 - Process

Emission Source/Control: CS100 - Process

Item 42.16:

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

Emission Unit: U-SOLID
Process: CS2 Source Classification Code: 3-08-999-99
Process Description:
This process includes the reprocessed polystyrene pellet (RPP) transfer system from the reclaim extruders to silos that are not equipped with a control device. The emissions of concern are particulate matter.

Emission Source/Control: CS200 - Process

Item 42.17:

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

Emission Unit: U-SOLID
Process: M53 Source Classification Code: 3-08-999-99
Process Description:
This process includes the reclaim extruder line 153 feed bin and associated fabric filter control. The emissions of concern are particulate matter. This process covers OPS reclaim transfer.

Emission Source/Control: DCM53 - Control
Control Type: FABRIC FILTER

Emission Source/Control: CD-53 - Process

Item 42.18:

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

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Emission Unit: U-SOLID

Process: M54

Source Classification Code: 3-08-999-99

Process Description:

This process includes the feed for the line 154 reclaim extruder and associated fabric filter control. The only pollutant emitted is particulate matter. The process covers the transfer of OPS reclaim.

Emission Source/Control: DCM54 - Control

Control Type: FABRIC FILTER

Emission Source/Control: CD-54 - Process

Item 42.19:

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

Emission Unit: U-SOLID

Process: UB1

Source Classification Code: 3-08-999-99

Process Description:

This process includes foam extruder use bins and associated fabric filter controls. The emissions of concern are particulate matter.

Emission Source/Control: DCR01 - Control

Control Type: FABRIC FILTER

Emission Source/Control: DCR02 - Control

Control Type: FABRIC FILTER

Emission Source/Control: DCR03 - Control

Control Type: FABRIC FILTER

Emission Source/Control: DCR04 - Control

Control Type: FABRIC FILTER

Emission Source/Control: DCV01 - Control

Control Type: FABRIC FILTER

Emission Source/Control: DCV02 - Control

Control Type: FABRIC FILTER

Emission Source/Control: DCV03 - Control

Control Type: FABRIC FILTER

Emission Source/Control: DCV04 - Control

Control Type: FABRIC FILTER

Emission Source/Control: RB-01 - Process

Emission Source/Control: RB-02 - Process



Emission Source/Control: RB-03 - Process

Emission Source/Control: RB-04 - Process

Emission Source/Control: VB-01 - Process

Emission Source/Control: VB-02 - Process

Emission Source/Control: VB-03 - Process

Emission Source/Control: VB-04 - Process

Item 42.20:

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

Emission Unit: U-SURFA

Process: FOG

Source Classification Code: 4-02-999-96

Process Description:

This process includes the application of antifog clear coating to the plastic product. Minor amounts of VOC are emitted in the process.

Emission Source/Control: FOG01 - Process

Condition 43: Compliance Certification

Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement: 6 NYCRR 225-1.2 (g)

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-EMGEN

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of a stationary combustion installation that fires distillate oil other than number two heating oil are limited to the purchase of distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2014. Compliance with this limit will be based on vendor certifications.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis,

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within 30 days after the end of the semiannual period.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: DISTILLATES
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 0.0015 percent by weight
Monitoring Frequency: PER DELIVERY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 44: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-EMGEN

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

Item 44.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies once each time the combustion installation is in operation and during readiness tests. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any

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necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 45: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (4) (iii)

Item 45.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

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

Item 45.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:
The RACT analysis, submitted January 2014, details the infeasibility of further controlling emissions from processes EX1, TF1 and RST. The department has approved

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this RACT analysis, therefore an alternative emission limit has been established for these processes.

Pactiv shall calculate and record emissions on a rolling 12-month basis to show that annual emissions of VOCs will not exceed 554.7 tons per year for these processes.

Mass balances, AP-42 emission factors, manufacturers data, stack tests or other credible sources shall be used to determine emissions on a monthly basis. All records shall be kept for a minimum of 5 years in a format acceptable to the department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: VOC's

Parameter Monitored: VOC's

Upper Permit Limit: 554.7 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-month rolling average

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 46: Compliance Certification

Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 212-3.1 (c) (4) (i)

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: R01

Emission Source: CT005

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility shall continuously monitor and record the combustion chamber temperature from the Nestec regenerative thermal oxidizer (CT005). The monitors shall be periodically calibrated and operated at all times that the associated control equipment is operating.

The facility shall operate the source at the minimum

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combustion chamber temperature of 1450 Deg. F, as determined during the performance test. Compliance with the minimum combustion chamber temperature shall be determined on a continuous 3-hour rolling average basis.

The facility shall operate the source at the above listed minimum chamber temperature unless a more recent stack test has shown that acceptable control efficiency is achieved with a lower combustion chamber temperature.

A permit modification shall be required to establish a lower minimum combustion chamber temperature.

Manufacturer Name/Model Number: Thermocouple

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1450 degrees Fahrenheit

Reference Test Method: METHOD 25A

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 47: Compliance Certification

Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (4) (i)

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: R01

Emission Source: CT005

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Volatile organic compound (VOC) emission points which are equipped with a capture and control device with an overall removal efficiency of at least 81% are equipped with Reasonably Available Control Technology.

The Nestec RTO (CT005) shall maintain a minimum of 95% reduction by weight of VOCs.



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An acceptable stack test of the Nestec RTO shall be conducted once per permit term to verify compliance with the 95% reduction by weight minimum.

Parameter Monitored: VOC

Lower Permit Limit: 95 percent reduction by weight

Reference Test Method: 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 48: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (4) (i)

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: R03

Emission Source: CT004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Volatile organic compound (VOC) emission points which are equipped with a capture and control device with an overall removal efficiency of at least 81% are equipped with Reasonably Available Control Technology.

The Crawford RTO (CT004) shall maintain a minimum of 90% reduction by weight of VOCs.

An acceptable stack test of the Crawford RTO shall be conducted once per permit term to verify compliance with the 90% reduction by weight minimum.

Parameter Monitored: VOC

Lower Permit Limit: 90 percent reduction by weight

Reference Test Method: 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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Condition 49: Compliance Certification
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (4) (i)

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-FOAMS

Process: R03

Emission Source: CT004

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 49.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility shall continuously monitor and record the combustion chamber temperature from the Crawford regenerative thermal oxidizer (CT004). The monitors shall be periodically calibrated and operated at all times that the associated control equipment is operating.

The facility shall operate the source at the minimum combustion chamber temperature of 1425 Deg. F, as determined during the performance test. Compliance with the minimum combustion chamber temperature shall be determined on a continuous 3-hour rolling average basis.

The facility shall operate the source at the above listed minimum chamber temperature unless a more recent stack test has shown that acceptable control efficiency is achieved with a lower combustion chamber temperature.

A permit modification shall be required to establish a lower minimum combustion chamber temperature.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1425 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

Condition 50: VOL storage tanks from 10000 - 20000 gallons

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Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (iv)

Item 50.1:

This Condition applies to Emission Unit: U-FOAMS
Process: T01

Item 50.2:

Volatile organic liquid tanks with a capacity greater than or equal to 10,000 gallons but less than 20,000 gallons must be equipped with submerged fill.

Condition 51: Once in always in

Effective between the dates of 08/28/2017 and 08/27/2022

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

Item 51.1:

This Condition applies to Emission Unit: U-SILIC

Item 51.2:

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

Condition 52: Compliance Certification

Effective between the dates of 08/28/2017 and 08/27/2022

Applicable Federal Requirement:6 NYCRR 228-1.4 (d) (3)

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-SILIC

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 52.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility applying coatings to paper film and foil may

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not use coatings with VOC contents, as applied, which exceed 0.08 kg VOC/kg coating applied.

The VOC content limit can be met by averaging the VOC content of the materials used on a single surface coating line ('i.e.' daily with-in-line averaging).

Materials used to form unsupported substrates, such as calendaring of vinyl, brown film, cast film, extruded film and co-extruded film are not considered coating for the purpose of the VOC content limit.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 0.08 kilograms VOC per kilogram as applied

Monitoring Frequency: SEMI-ANNUALLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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

**Condition 53: Once in always in
Effective between the dates of 08/28/2017 and 08/27/2022**

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

Item 53.1:

This Condition applies to Emission Unit: U-SURFA

Item 53.2:

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



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 by 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 be demonstrated 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 permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner 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 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 or operator seeking to establish the occurrence of an emergency has the burden of proof.

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

Item B: 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 applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 54: Contaminant List

Effective between the dates of 08/28/2017 and 08/27/2022

Applicable State Requirement:ECL 19-0301

Item 54.1:

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 55: Malfunctions and start-up/shutdown activities

Effective between the dates of 08/28/2017 and 08/27/2022

Applicable State Requirement:6 NYCRR 201-1.4

Item 55.1:

(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 56: Compliance Demonstration
Effective between the dates of 08/28/2017 and 08/27/2022

Applicable State Requirement: 6 NYCRR 212-2.3 (b)

Item 56.1:

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

Emission Unit: U-FOAMS

Emission Unit: U-OPSEX

Emission Unit: U-PYROL

Emission Unit: U-SOLID

Item 56.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall not allow emissions



of an air contaminant to violate the requirements specified in Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental rating assigned to the contaminant by the department.

The listed non-HTAC contaminants have been demonstrated to be in compliance with 6 NYCRR Part 212-2.1(b) by meeting either:

- 1- the degree of air cleaning required for the rating given to each contaminant, or
- 2- the DAR-1 guideline concentrations.

The facility owner or operator shall verify the parameters used to demonstrate compliance with Table 4 semi-annually.

These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer's or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating of any contaminant may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any unforeseen instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Records of calculation reviews, observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the semi-annual compliance monitoring report.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

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