

Facility DEC ID: 9292600097

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-2926-00097/00003
Mod 0 Effective Date: 04/20/2015 Expiration Date: 04/19/2025
Mod 1 Effective Date: 06/27/2017 Expiration Date: 04/19/2025
Mod 2 Effective Date: 04/16/2020 Expiration Date: 04/19/2025
Mod 3 Effective Date: 06/18/2020 Expiration Date: 04/19/2025

Permit Issued To: BISON BAG CO INC
5404 CROWN DR
LOCKPORT, NY 14094

Contact: JAMES G STREICHER
BISON BAG CO INC
5404 CROWN DR
LOCKPORT, NY 14094
(716) 434-4380

Facility: BISON BAG CO INC
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LOCKPORT, NY 14094

Contact: JAMES G STREICHER
BISON BAG CO INC
5404 CROWN DR
LOCKPORT, NY 14094
(716) 434-4380

Description:

This minor permit modification (REN1 MOD3) establishes a new minimum operating temperature for the Anguil 50 regenerative thermal oxidizer (emission source 0001A). The results of the initial stack test performed on December 10, 2019, were rejected due to the discovery that a faulty oxidizer part caused improper operating conditions. An additional stack test was performed on May 6, 2020, to establish the new minimum operating temperature of 1543 degrees F. Permit condition 3-1 replaces former condition 2-4. All other permit conditions remain the same.

Bison Bag is a commercial printer of flexible poly and plastic packaging predominantly for the food industry. This permit modification represents the installation of an additional flexographic printing press (a 10-color W&H Miraflex II M press identified as emission source 0002C) and an Anguil 5000

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cfm regenerative thermal oxidizer (RTO) identified as emission source 0001A. After this installation, the facility will operate four flexographic printing presses, two RTOs, two solvent-less laminators, and hot-knife cutting machines.

Inks and adhesives are applied to raw materials to print, coat, laminate and bond different materials in layers. The main sources of air emissions are the volatile organic compounds (VOCs) from the solvent based inks utilized on the facility's flexographic presses. The facility utilizes inks for its presses which do not contain hazardous air pollutants (HAPs).

Bison Bag will continue to limit facility-wide actual emissions of total volatile organic compounds (VOC) to less than 50 tons during any consecutive 12-month period in order to cap out of the major source Title V permitting requirements of 6NYCRR Part 201-6. This emission limit is unchanged from the previously issued permit. An Annual Capping Certification must be submitted to the Department for each calendar year.

Bison Bag will limit VOC emissions using permanent total enclosures and RTOs. They must assure compliance with the minimum overall VOC removal efficiency rate of 80% as required by 6NYCRR Part 234.3(a)(1)(ii)(e) for the capture and control devices. The overall VOC removal efficiency is the product of the capture efficiency of the gas collection system and the destruction efficiency of the oxidizer. The overall VOC removal efficiency must be verified via performance testing.

The laminators use a two-part solvent-less adhesive system to bond flexible packaging components. The two-part adhesive contains (and/or reacts to generate) diisocyanate compounds, which are a Highly Toxic Air Contaminant (HTAC) per 6NYCRR Part 212-2.2 Table 2 with a Mass Emission Limit (MEL) of 100 pounds per year. Supporting calculations submitted with the permit application show a potential-to-emit of less than 2 pounds per year, thereby satisfying compliance with the regulation.

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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: MARK F PASSUITE
 NYSDEC - REGION 9
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ___ / ___ / ___

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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

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DEC GENERAL CONDITIONS

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

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 1-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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 1-1.2:

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

Item 1-1.3

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

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Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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

Condition 2-1: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 2-1.1:

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 2-1.2:

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

Item 2-1.3

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

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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 9 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 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Authorized Activity By Standard Industrial Classification Code:
2759 - COMMERCIAL PRINTING, NEC

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Mod 3 Permit Effective Date: 06/18/2020

Permit Expiration Date: 04/19/2025

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- 8 2-2 6 NYCRR 234.3 (a) (1) (ii) ('e'): Compliance Demonstration
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EU=0-00001

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NOTE: * preceding the condition number indicates capping.

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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/Mod 3/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

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required to operate such device effectively.

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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial

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Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: Required Emission Tests - 6 NYCRR 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Facility Permissible Emissions
Effective between the dates of 04/20/2015 and 04/19/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1.1:

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

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

per year	CAS No: 0NY998-00-0 (From Mod 3)	PTE: 99,000 pounds
	Name: VOC	

Condition 2-1: Capping Monitoring Condition
Effective between the dates of 04/16/2020 and 04/19/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Replaces Condition(s) 1-1

Item 2-1.1:

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 201-6.1

Item 2-1.2:

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

Item 2-1.3:

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.

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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 2-1.4:

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

Item 2-1.5:

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

Item 2-1.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2-1.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The permittee will limit facility-wide actual emissions of volatile organic compounds (VOC) to less than 49.5 tons per year, on a 12-month rolling total basis, for purposes of capping out of the major facility applicability requirements of 6NYCRR Part 201-6.

The actual VOC emissions shall be calculated based on the usage of ink, varnish, adhesive, solvent, and other VOC containing products; the VOC content of the products; and an overall VOC capture and destruction efficiency as determined by actual source testing. The general accuracy of the emission calculations shall be verified by maintaining pertinent records including, but not limited to: purchase and/or production records, VOC content of products, and hours of operation. All records with corresponding emission calculations shall be kept on-site for a minimum of five years. This information shall be made available to the Department on request.

Bison Bag will not exceed an emission rate of 49.5 tons of VOCs per 12-month period for all emission sources. Compliance will be determined by summing the individual

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monthly emissions during any consecutive 12-month period using the following formula:

$$\text{VOC} = [\text{VOC}(\text{es}) \times (1 - \text{CDE})]$$

where,

VOC(es) = VOC emissions generated by each emission source

CDE = overall capture and destruction efficiency of the specific permanent total enclosure and oxidizer systems as measured during the most recent performance testing.

The facility shall submit to the Department an Annual Capping Certification report for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each rolling 12-month period throughout the calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: VOC's

Parameter Monitored: VOC

Upper Permit Limit: 49.5 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2020.

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

Condition 17: Visible Emissions Limited
Effective between the dates of 04/20/2015 and 04/19/2025

Applicable Federal Requirement:6 NYCRR 211.2

Item 17.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 2-2: Compliance Demonstration
Effective between the dates of 04/16/2020 and 04/19/2025

Applicable Federal Requirement:6 NYCRR 234.3 (a) (1) (ii) ('e')

Replaces Condition(s) 1-2

Item 2-2.1:

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The Compliance Demonstration activity will be performed for the Facility.

Item 2-2.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

As specified in 6NYCRR Part 234.3(a)(1)(ii)(e), where a flexographic printing process is employed, the capture system and the air cleaning device must provide for an overall reduction in volatile organic compound (VOC) emissions of at least 80 percent for a printing process that was first installed on or after March 14, 1995, and that is controlled by an add-on capture system and air cleaning equipment that was first installed after July 8, 2010. The overall removal efficiency consists of two components and is calculated as the product of the capture efficiency of the gas collection system and the destruction efficiency of the control equipment.

The facility has documented 100% capture via permanent total enclosure testing for the 8-color UTECO Onyx 808 press (emission source 00004), two 10-color UTECO Onyx 108 presses (emission sources 0002A & 0002B), and the 10-color W&H Miraflex II M press (emission source 0002C). The destruction efficiency of each regenerative thermal oxidizer (RTO) was determined via reference method performance testing on October 25, 2017 for the Anguil 20000 cfm RTO (emission source 0001B) and on December 10, 2019 for the Anguil 5000 cfm RTO (emission source 0001A).

Initial compliance with this requirement will be demonstrated during performance testing as detailed elsewhere in this permit in a condition per 6NYCRR Part 234.4(a). Continuous compliance with the minimum required 80% overall removal efficiency will be assured by: (1) maintaining and operating the capture systems as initially designed by the manufacturer, and (2) maintaining the destruction efficiency of the oxidizers.

Parameter Monitored: VOC

Lower Permit Limit: 80 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTIONAveraging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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Condition 2-3: Compliance Demonstration
 Effective between the dates of 04/16/2020 and 04/19/2025

Applicable Federal Requirement: 6 NYCRR 234.4 (a)

Item 2-3.1:

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

Emission Unit: 0-00001 Process: 001	Emission Source: 00004
Emission Unit: 0-00001 Process: 001	Emission Source: 0001A
Emission Unit: 0-00001 Process: 001	Emission Source: 0001B
Emission Unit: 0-00001 Process: 001	Emission Source: 0002A
Emission Unit: 0-00001 Process: 001	Emission Source: 0002B
Emission Unit: 0-00001 Process: 001	Emission Source: 0002C
Regulated Contaminant(s): CAS No: 0NY998-00-0 VOC	

Item 2-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Bison Bag must assure compliance with the minimum overall VOC removal efficiency rate of 80% for the capture and control devices. The overall VOC removal efficiency, which must be verified via performance testing, is the product of the capture efficiency of the gas collection system and the destruction efficiency of the oxidizer.

Performance tests determining the destruction efficiencies of the regenerative thermal oxidizers (RTOs) must be performed, in accordance with 40CFR60, Appendix A, Method 18, 25 or 25A, once every five years, based on the date of the previous test which was October 25, 2017 for the Anguil 20000 cfm RTO (emission source 0001B) and December 10, 2019 for the Anguil 5000 cfm RTO (emission source 00001A).

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The capture efficiencies of the three UTECO Onyx presses (emission sources 00004, 0002A, & 0002B) and the 10-color W&H Miraflex II M press (emission source 0002C) were determined in accordance with 40CFR60, Appendix A, Method 204 - Permanent Total Enclosure on October 25, 2017 and December 10, 2019, respectively.

The capture efficiency testing of the emission sources need only be repeated if physical changes to the air distribution system occur. Physical changes to the air distribution system include, but are not limited to, adding print stations to a press, increasing or decreasing the volumetric flow rate from the dryer (e.g., by changing the size of press fans/motors or removal or derating of dryers), and changing the static duct pressure.

Test protocol(s) shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at least 60 days prior to the proposed test date(s). Department staff will be afforded the opportunity to witness the performance test by notifying the RAPCE of the actual test date. A test report shall be submitted to the RAPCE within 60 days of test completion.

Lower Permit Limit: 80 percent reduction by weight
 Reference Test Method: EPA Method 18, 25, 25A, 204
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: 1-HOUR AVERAGE
 Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 3-1: Compliance Demonstration
Effective between the dates of 06/18/2020 and 04/19/2025

Applicable Federal Requirement: 6 NYCRR 234.4 (c)

Replaces Condition(s) 2-4

Item 3-1.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 3-1.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Temperature & Operating Requirements for ANGUIL 50 RTO (emission source 0001A):

Bison Bag will operate two regenerative thermal oxidizers (RTO) (emission sources 0001A and 0001B) to control volatile organic compounds (VOC). Bison Bag will assure

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that all VOC-laden gas streams from operating presses are routed to a properly operating oxidizer. Bison Bag will continuously monitor the combustion chamber temperatures of the RTOs.

For emission source 0001A, Bison Bag must maintain a minimum combustion chamber temperature of 1543 degrees Fahrenheit based on the average temperature recorded during the source test performed on May 6, 2020.

Performance testing shall be repeated at least once every five years, based on the dates of the previous tests.

A continuous monitor to measure the combustion chamber temperature must be installed, periodically calibrated, and operated at all times the RTO is operating. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. Bison Bag shall maintain continuous recording charts of the combustion chamber temperatures. The continuous chart recordings and the calibration data shall be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1543 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT
DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-5: Compliance Demonstration
Effective between the dates of 04/16/2020 and 04/19/2025

Applicable Federal Requirement: 6 NYCRR 234.4 (c)

Replaces Condition(s) 1-3

Item 2-5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2-5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Temperature & Operating Requirements for ANGUIL 200 RTO
(emission source 0001B):

Bison Bag will operate two regenerative thermal oxidizers
(RTO) (emission sources 0001A and 0001B) to control

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volatile organic compounds (VOC). Bison Bag will assure that all VOC-laden gas streams from operating presses are routed to a properly operating oxidizer. Bison Bag will continuously monitor the combustion chamber temperatures of the RTOs.

For emission source 0001B, Bison Bag must maintain a minimum combustion chamber temperature of 1552 degrees Fahrenheit based on the average temperature recorded during the source test performed on October 25, 2017.

Performance testing shall be repeated at least once every five years, based on the dates of the previous tests.

A continuous monitor to measure the combustion chamber temperature must be installed, periodically calibrated, and operated at all times the RTO is operating. Operation and calibration procedures shall be performed in accordance with manufacturer specifications. Bison Bag shall maintain continuous recording charts of the combustion chamber temperatures. The continuous chart recordings and the calibration data shall be maintained on-site for a period of 5 years and be made available for review upon request by the Department.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1552 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT
DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-4: Compliance Demonstration
Effective between the dates of 06/27/2017 and 04/19/2025

Applicable Federal Requirement: 6 NYCRR 234.5

Item 1-4.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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substrate.

This prohibition shall not apply to the following:

- (1) Ink, coating, or adhesive used in printing processes where control equipment has been installed to demonstrate compliance with this Part; or
- (2) Ink, coating, or adhesive used in printing processes that have been granted variances for reasons of technological and economic feasibility per section 234.3(f) of this Part.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-6: Compliance Demonstration
Effective between the dates of 04/16/2020 and 04/19/2025

Applicable Federal Requirement: 6 NYCRR 234.6

Replaces Condition(s) 5

Item 2-6.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2-6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with 6NYCRR Part 234.6, the permittee shall not use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access.

The permittee shall not use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive.

All cleaning-solvent, including solvent soaked materials, shall be kept in closed leak-free containers that are opened only when adding or removing material. Rags used

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for wipe cleaning shall be stored in closed containers when not in use. Each container shall be clearly labeled with its contents. Unless records show that VOC-containing cleaning material was sent offsite for legal disposal, it will be assumed that it evaporated on site.

If cleaning solvent escapes from a container, the permittee shall wipe up or otherwise remove immediately if in accessible areas. For areas where access is not feasible during normal production, remove as soon as reasonably possible.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-5: Compliance Demonstration
Effective between the dates of 06/27/2017 and 04/19/2025

Applicable Federal Requirement: 6 NYCRR 234.7

Item 1-5.1:
 The Compliance Demonstration activity will be performed for the Facility.

Item 1-5.2:
 Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

Purchase, usage and/or production records of inks, volatile organic compounds (VOC) and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the department's representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the commissioner's representative in a format acceptable to the Department. Records must be maintained at the facility for a period of five years.

The facility shall maintain the following records for each ink, cleaning solvent, and other VOC used in the printing process, on a yearly basis:

1. The brand and product name or code for the material.
2. The quantity of material used during the calendar year.
3. The VOC content of the material.

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the yearly log are to be kept on site. Upon

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written request from the Department, Bison Bag shall report or make available monthly recordkeeping to demonstrate compliance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-7: Compliance Demonstration
Effective between the dates of 04/16/2020 and 04/19/2025

Applicable Federal Requirement:6 NYCRR 234.8

Replaces Condition(s) 7

Item 2-7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2-7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A person shall not cause or allow emissions having an average opacity of 10 percent or greater for any consecutive six minute period from any emission source subject to this Part into the outdoor atmosphere.

Parameter Monitored: OPACITY

Upper Permit Limit: 10 percent

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-8: Compliance Demonstration
Effective between the dates of 04/16/2020 and 04/19/2025

Applicable Federal Requirement:40CFR 63.829(d), Subpart KK

Item 2-8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee owns/operates a facility affected by 40 CFR 63.820 Subpart KK - National Emission Standards for the Printing and Publishing Industry. Since potential emissions of hazardous air pollutants (HAP) are currently less than the major source thresholds of 10 tons for any

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individual hazardous air pollutant (HAP) and 25 tons of total HAP, the facility, as an area source, is subject only to the recordkeeping provisions of 63.829(d).

The permittee shall keep records, such as Material Safety Data Sheets (MSDS) or Technical Data Sheets which identify the percentage composition and type of all hazardous air pollutants (HAP) contained in the adhesive formulations used in the laminators, which are currently the only HAP sources in use at the facility. The permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with the emission threshold criteria.

The permittee will notify this Department prior to making any changes in formulation which would result in potential facility wide HAP emissions exceeding 10/25 tons for any individual and total HAP respectively. An increase in potential emissions beyond the 10/25 major source thresholds will require either a federally enforceable emissions cap or compliance with Subpart KK.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 1-6: Once in, always in
Effective between the dates of 06/27/2017 and 04/19/2025

Applicable Federal Requirement: 6 NYCRR 234.1 (c)**Item 1-6.1:**

This Condition applies to Emission Unit: 0-00001

Item 1-6.2:

A printing process that is subject to the provisions of Part 234 will remain subject to these provisions even if the emission of VOC from the facility or printing press later falls below the applicability criteria.

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.

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Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: **General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 12: Contaminant List

Effective between the dates of 04/20/2015 and 04/19/2025

Applicable State Requirement:ECL 19-0301

Item 12.1:

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

CAS No: 0NY998-00-0

Name: VOC

Condition 13: Malfunctions and start-up/shutdown activities

Effective between the dates of 04/20/2015 and 04/19/2025

Applicable State Requirement:6 NYCRR 201-1.4

Item 13.1:

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(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 14: Emission Unit Definition**Effective between the dates of 04/20/2015 and 04/19/2025****Applicable State Requirement: 6 NYCRR Subpart 201-5****Item 14.1 (From Mod 2):**

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

Emission Unit: 0-00001

Emission Unit Description:

This emission unit describes flexographic printing of packaging materials using four presses: an 8-color UTECO Onyx 808, two 10-color UTECO Onyx 108 presses, and a 10-color W&H Miraflex II M press. Emissions from the three UTECO presses are directed to an Anguil 20000 cfm regenerative thermal oxidizer (RTO) which exhausts to emission point 00001 and the emissions from the W&H

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Miraflex press are directed to an Anguil 5000 cfm RTO which exhausts to emission point 00010. This emissions unit also includes hot knife cutting machines and solventless laminators.

Building(s): 1

Condition 15: Renewal deadlines for state facility permits
Effective between the dates of 04/20/2015 and 04/19/2025

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

Item 15.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 2-9: CLCPA Applicability
Effective between the dates of 04/16/2020 and 04/19/2025

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

Item 2-9.1:

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

Condition 16: Compliance Demonstration
Effective between the dates of 04/20/2015 and 04/19/2025

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

Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
 NYS Dept. of Environmental Conservation
 Region 9
 270 Michigan Ave.

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Buffalo, NY 14203

Monitoring Frequency: ANNUALLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 7/30/2015.
 Subsequent reports are due every 12 calendar month(s).

Condition 4: Air pollution prohibited
Effective between the dates of 04/20/2015 and 04/19/2025

Applicable State Requirement:6 NYCRR 211.1

Item 4.1:

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 2-10: Compliance Demonstration
Effective between the dates of 04/16/2020 and 04/19/2025

Applicable State Requirement:6 NYCRR 212-2.1

Replaces Condition(s) 1-7

Item 2-10.1:

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

Emission Unit: 0-00001	
Process: 002	Emission Source: 00007
Emission Unit: 0-00001	
Process: 002	Emission Source: 00008

Item 2-10.2:

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 any High Toxicity Air Contaminant (HTAC) to exceed the limits specified in 6NYCRR Part 212-2.2 Table 2. Any proposed increase in any individual HTAC that would result in emissions greater than the values listed in Table 2 shall require a permit modification prior to implementation of such increase.

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The laminators use a two-part solvent-less adhesive system to bond flexible packaging components. The two-part adhesive contains (and/or reacts to generate) diisocyanate compounds. The limit in Table 2 for Diisocyanate compounds, which includes Methylene Bisphenyl Isocyanate (MDI), is 100 pounds per year. Supporting calculations show expected actual and potential-to-emit MDI emissions from the lamination process to be 1.4 and 2.0 pounds per year, respectively.

Monitoring Frequency: ANNUALLY

Averaging Method: ANNUAL TOTAL

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-11: Compliance Demonstration

Effective between the dates of 04/16/2020 and 04/19/2025

Applicable State Requirement: 6 NYCRR 212-2.1

Replaces Condition(s) 1-8

Item 2-11.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any proposed usage of inks or solvents which contain hazardous air pollutants (HAPs) will require written notification to this Department including identification of the HAP(s), calculation of potential emissions, and air dispersion modeling in accordance with DAR-1 "Guidelines for the Evaluation and Control of Ambient Air Contaminants Under Part 212" to demonstrate that emissions will not exceed short term (SGC) or annual guideline concentrations (AGC). A permit modification may be required if additional monitoring conditions or a change in current conditions is required.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Condition 18: Emission Point Definition By Emission Unit

Effective between the dates of 04/20/2015 and 04/19/2025

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Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1(From Mod 2):

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

Emission Unit: 0-00001

Emission Point: 00001

Height (ft.): 30 Diameter (in.): 24
 NYTMN (km.): 4786.7 NYTME (km.): 195.1 Building: 1

Emission Point: 00002

Height (ft.): 30 Diameter (in.): 22
 NYTMN (km.): 4786.7 NYTME (km.): 195.1 Building: 1

Emission Point: 00003

Height (ft.): 25 Diameter (in.): 8
 NYTMN (km.): 4786.7 NYTME (km.): 195.1 Building: 1

Emission Point: 00004

Height (ft.): 25 Diameter (in.): 8
 NYTMN (km.): 4786.7 NYTME (km.): 195.1 Building: 1

Emission Point: 00005

Height (ft.): 25 Diameter (in.): 19
 NYTMN (km.): 4786.7 NYTME (km.): 195.245 Building: 1

Emission Point: 00006

Height (ft.): 24 Diameter (in.): 19
 NYTMN (km.): 4786.7 NYTME (km.): 195.245 Building: 1

Emission Point: 00007

Height (ft.): 30 Diameter (in.): 16
 NYTMN (km.): 4786.7 NYTME (km.): 195.245 Building: 1

Emission Point: 00008

Height (ft.): 24 Diameter (in.): 19
 NYTMN (km.): 4786.7 NYTME (km.): 195.245 Building: 1

Emission Point: 00009

Height (ft.): 24 Diameter (in.): 19
 NYTMN (km.): 4786.7 NYTME (km.): 195.365 Building: 1

Emission Point: 00010

Height (ft.): 30 Diameter (in.): 22
 NYTMN (km.): 4787.1 NYTME (km.): 195.1 Building: 1

Emission Point: 00012

Height (ft.): 25 Diameter (in.): 8
 NYTMN (km.): 4786.7 NYTME (km.): 195.245 Building: 1

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Emission Point: 00013
 Height (ft.): 25 Diameter (in.): 8
 NYTMN (km.): 4756.7 NYTME (km.): 195.245 Building: 1

Emission Point: 00014
 Height (ft.): 25 Diameter (in.): 8
 NYTMN (km.): 4756.7 NYTME (km.): 195.245 Building: 1

Condition 19: Process Definition By Emission Unit
Effective between the dates of 04/20/2015 and 04/19/2025

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 19.1(From Mod 2):

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

Emission Unit: 0-00001
 Process: 001 Source Classification Code: 4-05-003-01

Process Description:

Flexographic printing on plastic/poly using a UTECO Onyx 8-color press installed in 2010, a UTECO Onyx 108 10-color press installed in 2013, a UTECO Onyx 108 10-color press installed in 2017, and a W&H Miraflex II M 10-color press installed in 2019. Volatile organic compound emissions from inks used in these presses are captured by permanent total enclosures and controlled by two regenerative thermal oxidizers which are vented to emission points 00001 and 00010.

Emission Source/Control: 0001A - Control
 Control Type: THERMAL OXIDATION

Emission Source/Control: 0001B - Control
 Control Type: THERMAL OXIDATION

Emission Source/Control: 00004 - Process

Emission Source/Control: 0002A - Process

Emission Source/Control: 0002B - Process

Emission Source/Control: 0002C - Process

Item 19.2(From Mod 2):

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

Emission Unit: 0-00001
 Process: 002 Source Classification Code: 4-02-007-01

Process Description:

Two laminators use solvent-less adhesives to produce food packaging that requires the lamination of different polymer film layers, including but not limited to

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polyethylene, polypropylene, and polyester. A rubber roller applies a metered amount of the adhesive to the film.

Emission Source/Control: 00007 - Process

Emission Source/Control: 00008 - Process

Item 19.3(From Mod 2):

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

Emission Unit: 0-00001

Process: 003

Source Classification Code: 4-02-022-99

Process Description:

Ten hot knife cutting machines used to seal and separate polyethylene and polypropylene bags. The machines are vented to a common duct and emission point EP 00002.

Emission Source/Control: 00006 - Process

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