

New York State Department of Environmental Conservation

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: API INDUSTRIES INC
2 GLENSHAW ST
ORANGEBURG, NY 10962

Facility: ALUF PLASTICS DIVISION
2 GLENSHAW ST
ORANGEBURG, NY 10962

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

Mod 0 Permit Effective Date: 01/29/2013
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date:

Permit Expiration Date:



PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 5 1 6 NYCRR 200.7: Maintenance of Equipment
- 6 1-1 6 NYCRR 200.7: Compliance Demonstration
- 7 3 6 NYCRR 211.1: Air pollution prohibited

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 9 8 ECL 19-0301: Contaminant List
- 9 1-2 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 10 9 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 11 10 6 NYCRR Subpart 201-5: Emission Unit Definition
- 12 1-3 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 13 1-4 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 13 1-5 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 15 1-6 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 15 1-7 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 16 1-8 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 16 1-9 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 17 12 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 17 13 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 19 14 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=0-00001,Proc=001

- 22 1-10 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 22 1-11 6 NYCRR 201-5.3 (c): Compliance Demonstration

EU=0-00003,Proc=003

- 23 1-12 6 NYCRR 201-5.3 (c): Compliance Demonstration



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or



modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

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

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

Item E: 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 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

New York State Department of Environmental Conservation

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190



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)

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: Maintenance of Equipment
Effective between the dates of 01/29/2013 and Permit Expiration Date



Applicable Federal Requirement:6 NYCRR 200.7

Item 1.1:

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 1-1: Compliance Demonstration
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 200.7

Replaces Condition(s) 2

Item 1-1.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Aluf Plastics shall operate and maintain the particulate removal systems and carbon adsorption units in accordance with good engineering practice and engineering specification. Particulate removal systems and carbon adsorption units, including in-line carbon filters and in-line HEPA filters, shall be inspected weekly and exchanged as needed in accordance with good engineering practice and engineering specifications. Breakthrough of the carbon adsorption units shall be avoided by implementing scheduled replacement based on the engineering design. Facility shall perform weekly inspections of all filters.

In the event a nuisance condition is detected prior to scheduled maintenance, Aluf Plastics must perform an investigation and corrective action within 24 hours. The Department shall be notified of each nuisance condition immediately. Such notification shall describe the cause of the nuisance condition and any corrective action completed. Instances which require more than 24 hours to complete corrective action must be itemized and acceptable to the Department.

Aluf Plastics must keep records of the date and description of each scheduled and unscheduled maintenance procedure completed. The facility will also keep records of inspection and replacement dates. These records must be maintained onsite and available for Department review.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

New York State Department of Environmental Conservation

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190



Condition 3: Air pollution prohibited
Effective between the dates of 01/29/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 211.1

Item 3.1:

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.



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

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

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

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

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

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

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.



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 8: Contaminant List
Effective between the dates of 01/29/2013 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

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

No contaminants.

Condition 1-2: Malfunctions and start-up/shutdown activities
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-2.1:

(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 9: Unavoidable noncompliance and violations
Effective between the dates of 01/29/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 9.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment 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 commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard



in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) 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.

Condition 10: Emission Unit Definition
Effective between the dates of 01/29/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 10.1(From Mod 1):

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

Emission Unit: 0-00001

Emission Unit Description:

This emission unit consists of three (3) polyethylene reprocessing and extrusion lines (REP02, REP03 and REP04) that discharge through Emission Point 00011. Emissions are captured by a dedicated exhaust hood (total of 7 hoods). Each line has at least one exhaust hood associated with it. Fumes are then pulled via an induced draft (ID) fan into a cyclone followed by a 3-stage filter assembly. The three stage filter consists of a blue poly pad, a pleated filter, and a 10 pocket bag filter (Vee Bag). The lines are then pulled by a second ID fan and manifold into a four stage custom built assembly. The four stage filter consists of a blue poly pad next to a pleated filter, followed by a Vee Bag, and finally a HEPA filter. From this assembly, the fumes are then sent under positive pressure to a custom pre-built filter housing with four Flanders PrecisionAire Filters (24"x24"x2"), and finally to the US Filter Model RB-10 treatment absorber equipped with 10,000 pounds of activated carbon.

New York State Department of Environmental Conservation

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190



Building(s): 001

Item 10.2(From Mod 1):

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

Emission Unit: 0-00002

Emission Unit Description:

This emission unit consists of 12 silos used to store plastic pellets and virgin resin.

Building(s): 001

Item 10.3(From Mod 1):

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

Emission Unit: 0-00003

Emission Unit Description:

This emission unit consists of 31 plastic bag extrusion lines using Internal Bubble Cooling Dies. Exhaust from the creation of the bubble is exhausted outside of the building. The exhaust carries various Hazardous Air Pollutants (HAPs) from the melting process. The exhaust passes through both particulate controls (i.e. baffled pressure equalization chamber for primary control and 2 cyclones in series for secondary control) and formaldehyde controls (i.e. carbon adsorption) prior to being emitted.

Emission Point 00021 includes the following emission source extrusion lines:

EXT30, EXT31, EXT32, EXT33, EXT34, EXT41, EXT42, EXT43, EXT44,
EXT45,
and EXT54

Emission Point 00022 includes the following emission source extrusion lines:

EXT15, EXT16, EXT17, EXT18, EXT21, and EXT22

Emission Point 00023 includes the following emission source extrusion lines:

EXT07, EXT08, EXT11, EXT12, and EXT13

Emission Point 00024 includes the following emission source extrusion lines:

EXT02, EXT03, EXT05, EXT06, EXT09, EXT10, EXT14, EXT19, and EXT20.

Building(s): 001

**Condition 1-3: Renewal deadlines for state facility permits
Effective for entire length of Permit**

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



Item 1-3.1:

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 1-4: Compliance Demonstration
Effective for entire length of Permit**

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

Item 1-4.1:

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

Emission Unit: 0-00001

Emission Unit: 0-00003

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator must have the vendors inspect and sample the carbon unit from the reprocessing area every 3 months. The date, time, and results of each inspection shall be maintained in log and made available to the department upon request. The log must be kept on site for a period of a least 5 years.

Monitoring Frequency: QUARTERLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-5: Compliance Demonstration
Effective for entire length of Permit**

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

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:

ALUF will install an upgraded ventilation system in accordance with an agreement with the NYSDEC. Brief synopsis below.

ALUF's manufacturing is divided into four main rooms: Retail, Repro, High-Density and Low-Density



The Retail Room is 360 ft. x 160 ft. x 25 ft. or 1,440,000 cu. ft. Manufacturing happens in the eastern half of the room with the balance being warehousing and offices. Six existing exhaust fans provide 14,400 CFM of ambient air movement through the room or 0.58 air exchanges an hour. The upgrade will increase the makeup air to 60,000 CFM using two roof mounted ventilators adding filtered air to the room for 2.5 air exchanges an hour or a 4.3 X's improvement.

The six existing wall fans will now have in essence a pressurized feed resulting in a higher volume output. They will now exhaust room air with any fugitive emissions from the process that is more than four times the dilution as present exhaust.

The Repro Room is 360 ft. x 120 ft. x 25 ft. or 1,080,000 cu. ft. Manufacturing happens in the eastern half of the room with the balance being warehousing and offices. Three existing exhaust fans provide 7,200 CFM of ambient air movement through the room or 0.4 air exchanges an hour. The proposal is to increase the makeup air to 60,000 CFM using two roof mounted ventilators adding filtered air to the room for 3.3 air exchanges an hour or an 8.3 X's improvement.

Due to the high level of fugitive emissions this room has experienced in the past, the additional caution of adding filtration to the room exhaust is to be taken. The exhaust will exit through a series of fabric and carbon filters. The three wall fans will be removed and two powered exhaust/filtration units rated at 30,000 CFM will be roof mounted. These units will extract all the air the makeup units add to the room for a balanced air flow, constantly at 3.3 exchanges per hour.

The High-Density Room is 240 ft. x 120 ft. x 25 ft. or 726,000 cu. ft. The room is densely packed with heat generating manufacturing. Three existing exhaust fans provide 7,200 CFM of ambient air movement through the room or 0.60 air exchanges an hour. The proposal is to increase the makeup air to 60,000 CFM using two roof mounted ventilators adding filtered air to the room for 4.96 air exchanges an hour or a 8.3 X's improvement. The three existing wall fans will now have in essence a pressurized feed resulting in a higher volume output. They will now exhaust room air with any fugitive emissions from the process that is nearly five times the dilution as present exhaust.

The Low-Density Room is 240 ft. x 323 ft. x 35 ft. or 2,688,000 cu. ft. The room is divided in two and is somewhat densely packed with heat generating manufacturing. Six existing exhaust fans provide 14,400 CFM of ambient air movement through the room or 0.32 air exchanges an hour. The proposal is to increase the makeup air to 120,000 CFM using four roof mounted ventilators adding filtered air to the room for 2.7 air exchanges an hour or an 8.3 X's improvement.



ALUF will inform the Department when the ventilation upgrade is complete.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-6: Compliance Demonstration
Effective for entire length of Permit

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

Item 1-6.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator must ensure the Reverse a Duct Bladder is maintained in good working condition and positioned properly based on the time of year. During winter operation, the inner bladder must be installed over the bottom collar to blow air up. During summer operation, the inner bladder must be installed over the top collar to blow air down. The facility owner or operator shall maintain a log of any change in bladder position and the date at which it occurs. The records shall be kept on site for a period of at least 5 years and made available to the department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-7: Compliance Demonstration
Effective for entire length of Permit

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

Item 1-7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator shall operate the ventilation system for a minimum of five hours after the last extrusion line has been shut down. The facility owner or operator shall maintain records indicating the date and time the last extrusion line was shut down and

New York State Department of Environmental Conservation

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190



the date and time the ventilation system was shut down. Such records shall be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Parameter Monitored: HOURS OF OPERATION

Lower Permit Limit: 5 hours

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-8: Compliance Demonstration
Effective for entire length of Permit

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

Item 1-8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Aluf shall install automatic closure devices and alarms on all exterior personnel doors at the facility in accordance with fire safety requirements. Alarms on exterior personnel doors shall sound locally and shall alert a shift supervisor if any door remains open longer than 15 minutes. Aluf Plastics shall maintain a record of the date and time of all door alarms. Such records must be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Loading dock doors shall be closed when not in use. When loading dock doors are in use, Aluf Plastics shall ensure that a weatherproof seal is in place. Aluf Plastics shall post signs near the loading dock doors stating that loading dock doors must be closed when not in use.

All other material handling doors shall be equipped with plastic weather curtains.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-9: Compliance Demonstration
Effective for entire length of Permit

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

Item 1-9.1:

The Compliance Demonstration activity will be performed for the Facility.

New York State Department of Environmental Conservation

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190



Item 1-9.2:

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 3
21 South Putt Corners Rd.
New Paltz, NY 12561

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 12: Visible Emissions Limited
Effective between the dates of 01/29/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 12.1:

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

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

Condition 13: Emission Point Definition By Emission Unit
Effective between the dates of 01/29/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 13.1(From Mod 1):

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

Emission Unit: 0-00001

Emission Point: 00011

Height (ft.): 65

Diameter (in.): 8

NYTMN (km.): 4545.723 NYTME (km.): 588.119

Item 13.2(From Mod 1):

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



Emission Unit: 0-00002

Emission Point: 00012
Height (ft.): 15 Diameter (in.): 8
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00013
Height (ft.): 8 Diameter (in.): 8
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00014
Height (ft.): 8 Diameter (in.): 8
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00015
Height (ft.): 15 Diameter (in.): 8
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00016
Height (ft.): 60 Diameter (in.): 8
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00017
Height (ft.): 60 Diameter (in.): 8
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00018
Height (ft.): 26 Diameter (in.): 8
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00019
Height (ft.): 26 Diameter (in.): 8
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00020
Height (ft.): 26 Diameter (in.): 8
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00025
Height (ft.): 60 Diameter (in.): 144
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00026
Height (ft.): 60 Diameter (in.): 144
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00027
Height (ft.): 60 Diameter (in.): 144
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Item 13.3(From Mod 1):

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



Emission Unit: 0-00003

Emission Point: 00021
Height (ft.): 26 Diameter (in.): 6
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00022
Height (ft.): 65 Diameter (in.): 24
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00023
Height (ft.): 65 Diameter (in.): 24
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Emission Point: 00024
Height (ft.): 71 Diameter (in.): 24
NYTMN (km.): 4545.723 NYTME (km.): 588.119

Condition 14: Process Definition By Emission Unit
Effective between the dates of 01/29/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 14.1(From Mod 1):

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

Emission Unit: 0-00001
Process: 001
Process Description:
This process consists of the reprocessing and extrusion of polyethylene in four polyethylene reprocessing and extrusion lines.

Emission Source/Control: CAR11 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF11 - Control
Control Type: PARTICULATE TRAP

Emission Source/Control: REPO2 - Process

Emission Source/Control: REPO3 - Process

Emission Source/Control: REPO4 - Process

Item 14.2(From Mod 1):

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

Emission Unit: 0-00002
Process: 002
Process Description:
This process consists of the bulk storage of plastic pellets and



virgin resin in storage silos.

Emission Source/Control: SIL10 - Process

Emission Source/Control: SIL11 - Process

Emission Source/Control: SIL12 - Process

Emission Source/Control: SILO1 - Process

Emission Source/Control: SILO2 - Process

Emission Source/Control: SILO3 - Process

Emission Source/Control: SILO4 - Process

Emission Source/Control: SILO5 - Process

Emission Source/Control: SILO6 - Process

Emission Source/Control: SILO7 - Process

Emission Source/Control: SILO8 - Process

Emission Source/Control: SILO9 - Process

Item 14.3(From Mod 1):

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

Emission Unit: 0-00003

Process: 003

Process Description:

This process consists of polyethylene extrusion to form plastic bags using Internal Bubble Cooling Dies.

Emission Source/Control: CAR21 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CAR22 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CAR23 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CAR24 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: CYF21 - Control

Control Type: PARTICULATE TRAP

Emission Source/Control: CYF22 - Control

Control Type: PARTICULATE TRAP

New York State Department of Environmental Conservation

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190



Emission Source/Control: CYF23 - Control
Control Type: PARTICULATE TRAP

Emission Source/Control: CYF24 - Control
Control Type: PARTICULATE TRAP

Emission Source/Control: EXT02 - Process

Emission Source/Control: EXT03 - Process

Emission Source/Control: EXT05 - Process

Emission Source/Control: EXT06 - Process

Emission Source/Control: EXT07 - Process

Emission Source/Control: EXT08 - Process

Emission Source/Control: EXT09 - Process

Emission Source/Control: EXT10 - Process

Emission Source/Control: EXT11 - Process

Emission Source/Control: EXT12 - Process

Emission Source/Control: EXT13 - Process

Emission Source/Control: EXT14 - Process

Emission Source/Control: EXT15 - Process

Emission Source/Control: EXT16 - Process

Emission Source/Control: EXT17 - Process

Emission Source/Control: EXT18 - Process

Emission Source/Control: EXT19 - Process

Emission Source/Control: EXT20 - Process

Emission Source/Control: EXT21 - Process

Emission Source/Control: EXT22 - Process

Emission Source/Control: EXT30 - Process

Emission Source/Control: EXT31 - Process

Emission Source/Control: EXT32 - Process



Emission Source/Control: EXT33 - Process
Emission Source/Control: EXT34 - Process
Emission Source/Control: EXT41 - Process
Emission Source/Control: EXT42 - Process
Emission Source/Control: EXT43 - Process
Emission Source/Control: EXT44 - Process
Emission Source/Control: EXT45 - Process
Emission Source/Control: EXT54 - Process

Condition 1-10: Compliance Demonstration
Effective for entire length of Permit

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

Item 1-10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001
Process: 001

Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Reprocessing line 1 (REP01) will be taken out of service and permanently dismantled. Department will be notified when line is permanently dismantled.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-11: Compliance Demonstration
Effective for entire length of Permit

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

Item 1-11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001
Process: 001

Item 1-11.2:

New York State Department of Environmental Conservation

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190



Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Aluf Plastics shall only accept film, compressed blocks, pellets, or chopped scrap polyethylene for processing at the facility. Any other type of plastic in film or any other form shall be rejected.

Aluf Plastics shall inspect each delivery of post industrial scrap film and determine whether it includes face printing (Incoming film with more than 25% of face printing shall be rejected).

Aluf Plastics shall make operational observations of the Repro process in order to determine whether any film is generating excessive smoke. If a film is found to generate excessive smoke, it shall be rejected in the future. The facility shall maintain a log of all rejected films and shall post the log in the scale room for use during incoming plastic inspection.

Internal scrap generated from in house processes is excluded from the inspection procedures described in this condition.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-12: Compliance Demonstration
Effective for entire length of Permit**

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

Item 1-12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

Process: 003

Item 1-12.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to prevent process temperatures from reaching the point where significant degradation of polyethylene may occur, Aluf Plastics shall ensure that temperature controllers on its extruders cause a high-temperature alarm to be activated when the extrusion melt temperature reaches 500 degrees Fahrenheit and shall implement internal procedures to respond to high temperature alarms. Aluf Plastics shall ensure that the temperature controller automatically shuts down the extruders when the extrusion melt temperature reaches 550 degrees Fahrenheit.

New York State Department of Environmental Conservation

Permit ID: 3-3924-00190/00006

Facility DEC ID: 3392400190



Aluf Plastics shall maintain a log including the date and time of each instance of high temperature alarms and/or high temperature shutdowns. Such records shall be maintained on site for a period of at least five years and must be made available to the Department upon request.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 550 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE
MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

