

**New York State Department of Environmental Conservation
Facility DEC ID: 1472803101**



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

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 1-4728-03101/00001
Effective Date: 03/30/2004 Expiration Date: No expiration date

Permit Issued To: JASCO INDUSTRIES INC
355 SOUTH TECHNOLOGY DR
CENTRAL ISLIP, NY 11722

Contact: JAY L AUSTRIAN
355 SOUTH TECHNOLOGY DRIVE
CENTRAL ISLIP, NY 11722
(631) 348-1772

Facility: JASCO INDUSTRIES INC
355 SOUTH TECHNOLOGY DR
CENTRAL ISLIP, NY 11722

Description:

The facility is a wood working facility preparing structures for commercial client point of purchase displays. Operations include woodworking machinery such as saws, joiners, drills, shapers, sanders, and routers, both manual and computer driven. Individual wood working machinery producing sawdust have dedicated vacuum systems exhausting to an outside bag house. These woodworking operations are separated from regulated from activities and are trivial under 6 NYCRR 201-3.3(c)(52) and (63).

Other operations include paint spray booths, gas fired drying ovens and laminating glueing.

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: ROGER EVANS
DIVISION OF ENVIRONMENTAL PERMITS
SUNY CAMPUS, LOOP ROAD, BUILDING 40
STONY BROOK, NY 11790-2356

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 0

ALBANY CENTRAL OFFICE



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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

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

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transfer of ownership.

Condition 4: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 4.1:

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

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

Condition 5: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 5.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

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

Condition 6: Submission of Applications for Permit Modification or Renewal -REGION 0
ALBANY CENTRAL OFFICE
Applicable State Requirement: 6NYCRR 621.5(a)

Item 6.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Chief Permit Administrator
Division of Environmental Permits
50 Wolf Rd.
Albany, NY 12233-1750
(518)457-2224



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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Authorized Activity By Standard Industrial Classification Code:
2541 - WOOD PARTITIONS AND FIXTURES



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 7 6NYCRR 202-2.1: Compliance Demonstration
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 1 6NYCRR 201-3.2(a): Compliance Demonstration
- 9 6NYCRR 211.3: Compliance Demonstration
- 19 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 2 6NYCRR 201-3.2(c): Exempt Activities - Industrial: (c)(31)
- 3 6NYCRR 201-3.2(c)(17): Surface Coating Exemption
- 4 6NYCRR 201-3.3(c): Trivial Activities - (c)(52)
- 5 6NYCRR 201-6.3(a)(2): Title V Permit Requirement
- 6 6NYCRR 202-1.1: Required Emissions Tests - Facility Level
- 10 6NYCRR 228.1(a): Applicability and compliance
- 11 6NYCRR 228.1(g): Once in, always in
- 12 6NYCRR 228.10: Compliance Demonstration
- 13 6NYCRR 228.10(a): Storage and disposal of cloth or paper impregnated with VOC
- 14 6NYCRR 228.10(b): Storage of spent or fresh VOC
- 15 6NYCRR 228.10(c): Spray equipment cleanup
- 16 6NYCRR 228.10(d): Requirements for storing and dispensing of surface coatings and inks
- 17 6NYCRR 228.10(e): Storage and disposal of spent surface coatings, VOCs, and solvents
- 18 40CFR 63.803, Subpart JJ: Subpart JJ: Work Practice Implementation Plan

Emission Unit Level

EU=0-00001

- 20 6NYCRR 228.3(a): Volatile organic compound emission control requirements
- 21 6NYCRR 228.4: Compliance Demonstration
- 22 6NYCRR 228.5(a): Compliance Demonstration
- 23 6NYCRR 228.5(b): method 24 40 CFR 60
- 24 6NYCRR 228.5(c): Alternative Analytical Methods
- 25 6NYCRR 228.5(d): samples
- 26 6NYCRR 228.5(e)(2): control equipment other than VOC/solvent recovery
- 27 6NYCRR 228.7: Compliance Demonstration
- 28 6NYCRR 228.8: Compliance Demonstration
- 29 6NYCRR 228.8: Compliance Demonstration

EU=0-00001,Proc=P01

- 30 6NYCRR 228.3(c): solids as applied
- 31 6NYCRR 228.5(f): Control requirement
- 32 6NYCRR 228.10(a): no open containers
- 33 6NYCRR 228.10(b): no open containers



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- 34 6NYCRR 228.10(c): equipment cleanup
- 35 6NYCRR 228.10(d): no open containers
- 36 6NYCRR 228.10(e): no open containers
- 37 40CFR 63.803, Subpart JJ: Work Practice Standards - Application equipment requirements
- 38 40CFR 63.804, Subpart JJ: New facility (finishing)- using compliant coatings
- 39 40CFR 63.806(b), Subpart JJ: Compliance Demonstration
- 40 40CFR 63.807(b), Subpart JJ: Reporting Requirements - Compliance status report
- 41 40CFR 63.807(c), Subpart JJ: Reporting Requirements - Periodic reports
- 42 40CFR 63.807(e), Subpart JJ: Reporting Requirements - notification of increase in VHAP usage

EU=0-00001,Proc=P01,ES=00CDO

- 43 40CFR 63.802, Subpart JJ: Existing facility- Emission limit for contact adhesives not meeting flammability requirements
- 44 40CFR 63.802, Subpart JJ: New facility- Emission limit for strippable spray booth coatings

EU=0-00001,Proc=P01,ES=00EPL

- 45 40CFR 63.802, Subpart JJ: Existing facility- Emission limit for contact adhesives not meeting flammability requirements

EU=0-00001,Proc=P01,ES=00IRO

- 46 40CFR 63.802, Subpart JJ: Existing facility- Emission limit for contact adhesives not meeting flammability requirements

EU=0-00001,Proc=P01,ES=00SB1

- 47 40CFR 63.802, Subpart JJ: Existing facility- Emission limit for contact adhesives not meeting flammability requirements

EU=0-00001,Proc=P01,ES=00SB2

- 48 40CFR 63.802, Subpart JJ: Existing facility- Emission limit for contact adhesives not meeting flammability requirements

EU=0-00001,Proc=P01,ES=00SB3

- 49 40CFR 63.802, Subpart JJ: Existing facility- Emission limit for contact adhesives not meeting flammability requirements

EU=0-00001,Proc=P01,ES=00SB4

- 50 40CFR 63.802, Subpart JJ: Existing facility- Emission limit for contact adhesives not meeting flammability requirements

EU=0-00002,Proc=P02

- 51 6NYCRR 228.3(c): solids as applied
- 52 6NYCRR 228.5(a): Compliance Demonstration



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- 53 6NYCRR 228.5(f): Control requirement
- 54 6NYCRR 228.10(a): no open containers
- 55 6NYCRR 228.10(b): no open containers
- 56 6NYCRR 228.10(c): equipment cleanup
- 57 6NYCRR 228.10(d): no open containers
- 58 6NYCRR 228.10(e): no open containers
- 59 40CFR 63.803, Subpart JJ: Work Practice Standards - Cleaning and washoff solvent accounting system
- 60 40CFR 63.804, Subpart JJ: New facility (adhesives)- using compliant contact adhesives
- 61 40CFR 63.806(b), Subpart JJ: Compliance Demonstration
- 62 40CFR 63.807(b), Subpart JJ: Reporting Requirements - Compliance status report
- 63 40CFR 63.807(c), Subpart JJ: Reporting Requirements - Periodic reports
- 64 40CFR 63.807(e), Subpart JJ: Reporting Requirements - notification of increase in VHAP usage

EU=0-00002,Proc=P02,ES=BNKS1

- 65 40CFR 63.802, Subpart JJ: Existing facility- Emission limit for contact adhesives not meeting flammability requirements

EU=0-00002,Proc=P02,ES=BNKS2

- 66 40CFR 63.802, Subpart JJ: Existing facility- Emission limit for contact adhesives not meeting flammability requirements

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 67 ECL 19-0301: Contaminant List
- 68 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 69 6NYCRR 201-5: Emission Unit Definition
- 70 6NYCRR 201-5.3(b): Compliance Demonstration
- 71 6NYCRR 211.2: Air pollution prohibited
- 72 6NYCRR 217-3.2: Idling of Diesel Trucks Limited
- 73 6NYCRR 217-3.3: Exceptions

Emission Unit Level

- 74 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 75 6NYCRR 201-5: Process Definition By Emission Unit

Permit Effective Date: 03/30/2004

Permit Expiration Date: No expiration date.



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 - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

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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 - 6NYCRR Part 201-1.2

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

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

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

Item E: Emergency Defense - 6NYCRR Part 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



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occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

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

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

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

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

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

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 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



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

Item J: Required Emission Tests - 6 NYCRR Part 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 6NYCRR Part 202-1.

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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.

Item L: Open Fires - 6 NYCRR Part 215

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Item M: 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



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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 N: 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 7: Compliance Demonstration
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year



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Condition 8: Recordkeeping requirements
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:

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

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

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

Condition 1: Compliance Demonstration
Effective between the dates of 03/30/2004 and Permit Expiration Date

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

Item 1.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As proof of exempt eligibility for the emergency generators, the facility must maintain monthly records which demonstrate that each engine is operated less than 500 hours per year, on a 12-month rolling total basis.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MINIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Compliance Demonstration
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 9.2:

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Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Except as permitted by a specific part of Title 6 of the NYCRR, 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.

Operators of air contamination sources that are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

- 1) Observe the stack(s) or vent(s) once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).
- 2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:
 - weather condition
 - was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days, then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

** NOTE ** Steam plumes generally form after leaving the



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top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2004.

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

Condition 19: Recycling and Emissions Reduction
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 19.1:

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

Condition 2: Exempt Activities - Industrial: (c)(31)
Effective between the dates of 03/30/2004 and Permit Expiration Date

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

Item 2.1:

The following activity is exempt from permitting requirements at non-Title V facilities, but must be included in Title V facility permit applications: Surface coating operations which are specifically exempted from regulation under Part 228, with respect to emissions of volatile organic compounds which are not given an A rating.

Condition 3: Surface Coating Exemption
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-3.2(c)(17)

Item 3.1:

The following activity is exempt from permitting requirements, but must be included in the Title V permit application: Surface coating and related operations which uses less than 25 gallons per month of coating



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materials (paints) and cleaning solvents, combined, subject to the following:

- (i) the facility is located outside of any severe ozone non attainment area; and
- (ii) all abrasive cleaning and surface coating operations are performed in an enclosed building where such operations are exhausted into appropriate emission control devices.

Condition 4: Trivial Activities - (c)(52)
Effective between the dates of 03/30/2004 and Permit Expiration Date

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

Item 4.1:

The following activity is trivial and is exempt from permitting requirements and does not need to be included in the Title V facility permit application: Hand held or manually operated equipment used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding or turning ceramic art work, ceramic precision parts, leather, metal parts, plastics, fiberboard, masonry, carbon, glass, graphite, wood or rubber.

Condition 5: Title V Permit Requirement
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.3(a)(2)

Item 5.1:

A Title V permit application must be submitted to the Department within one year of commencement of operation of this facility.

Condition 6: Required Emissions Tests - Facility Level
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 6.1:

An acceptable report of measured emissions shall be submitted, as required by the commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation.

Condition 10: Applicability and compliance
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.1(a)

Item 10.1:

Any owner or operator of a facility involving a coating line described in table 1 of 6NYCRR Part 228.7 or in table 2 of 6NYCRR Part 228.8 and which meets the current applicability criteria, must include with the application for a permit, the method or methods which will be used to comply with the requirements of 6NYCRR Part 228.

Condition 11: Once in, always in



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Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.1(g)

Item 11.1:

Any coating line subject to the provisions of this Part, will remain subject to these provisions even if the facility annual potential to emit VOC later falls below applicability criteria.

Condition 12: Compliance Demonstration

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No owner or operator of a facility subject to 6NYCRR Part 228 shall:

- (a) use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup, or coating removal;
- (b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup, or coating removal;
- (c) use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere;
- (d) use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance, or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate; or

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(e) use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

Open containers, if found, shall be covered.

The facility shall be inspected daily to determine if there are any open containers present. A log book shall be maintained to record these inspections and their results. the log book shall include the following information:

- date and time of inspection
- items or areas observed
- corrective measures taken, if necessary

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 10/29/2004 for the period 03/30/2004 through 09/29/2004

Condition 13: Storage and disposal of cloth or paper impregnated with VOC
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(a)

Item 13.1:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or coating removal.

Condition 14: Storage of spent or fresh VOC
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(b)

Item 14.1:

No owner or operator of a facility subject to 6NYCRR Part 228 shall store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or coating removal.

Condition 15: Spray equipment cleanup
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(c)

Item 15.1:



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No owner or operator of a facility subject to 6NYCRR Part 228 shall use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.

Condition 16: Requirements for storing and dispensing of surface coatings and inks
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(d)

Item 16.1:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate.

Condition 17: Storage and disposal of spent surface coatings, VOCs, and solvents
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(e)

Item 17.1:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

Condition 18: Subpart JJ: Work Practice Implementation Plan
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.803, Subpart JJ

Item 18.1:

Each owner or operator of a facility subject to Subpart JJ shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in 40CFR63.803 (b) through (l). The plan shall be developed no more than 60 days after the compliance date. The written work plan shall be made available to the Administrator upon request.

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

Condition 20: Volatile organic compound emission control requirements
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(a)



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Item 20.1:

This Condition applies to Emission Unit: 0-00001

Item 20.2:

No person shall cause or allow the usage of coatings that exceed the allowable pounds of volatile organic compounds per gallon, minus water and excluded VOC at application, as specified in table 1 and table 2 of Part 228, unless an approved coating system or approved control equipment is utilized or a variance has been granted.

In the absence of an approved coating system, approved control equipment or a variance, surface coating of only those materials specified in conditions of this permit citing Tables 1 and 2 in Sections 228.7 and 228.8 shall be allowed.

Condition 21: Compliance Demonstration

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.4

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source subject to this requirement, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies semi-annually while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal and in compliance with section 228.4 are detected (this may be

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zero percent opacity for many or all of the subject emission sources), the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected. If the permittee expects the excess visible emissions to occur in excess of 1 hour after discovery, the Department will be notified immediately.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify The Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

If the opacity is determined to exceed the limits of section 228.4, the facility will be determined to be in violation, the permittee will remedy the problem, and will contact the Department. The provisions of Part 201-1.4 shall apply.

The semiannual monitoring report and annual compliance certifications required of all permittees subject to Title V must include a summary of these observations.

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 45 days after the reporting period.

The initial report is due 8/14/2004.

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

Condition 22: Compliance Demonstration

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



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Monitoring Description:

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the department. Records must be maintained at the facility for a period of five years.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 23: method 24 40 CFR 60
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(b)

Item 23.1:

This Condition applies to Emission Unit: 0-00001

Item 23.2:

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings are presented in appendix A, method 24, of 40 CFR 60.

Condition 24: Alternative Analytical Methods
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(c)

Item 24.1:

This Condition applies to Emission Unit: 0-00001

Item 24.2:

Where the methods referenced in 6 NYCRR Part 228.5(b) are not applicable, alternate analytical methods for surface coating may be acceptable, subject to the approval of the commissioner.

Condition 25: samples
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(d)

Item 25.1:

This Condition applies to Emission Unit: 0-00001

Item 25.2:



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Representatives of the department shall be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance.

**Condition 26: control equipment other than VOC/solvent recovery
Effective between the dates of 03/30/2004 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 228.5(e)(2)

Item 26.1:

This Condition applies to Emission Unit: 0-00001

Item 26.2:

When a coating line utilizes control equipment to comply with the provisions of Part 228, test methods acceptable to the department must be used when demonstrating the overall removal efficiency. For control equipment other than VOC/solvent recovery, this demonstration must include provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of these air contaminants by the control equipment prior to their release to the atmosphere.

**Condition 27: Compliance Demonstration
Effective between the dates of 03/30/2004 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 228.7

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings applied to hardboard paneling may contain no more than 3.6 pounds of volatile organic compounds per gallon of coating, (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: PAINT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.6 pounds per gallon

Reference Test Method: Method 24 (40CFR60)



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Monitoring Frequency: SINGLE OCCURRENCE
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)
Initial Report Due: 10/29/2004 for the period 03/30/2004 through 09/29/2004

Condition 28: Compliance Demonstration
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.8

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

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

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

Opaque stains used for the surface coating of wood
products may contain a maximum of 4.7 pounds of volatile
organic compounds per gallon of coating (minus water and
excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: WOOD COATINGS - OPAQUE STAINS

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 4.7 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 10/29/2004 for the period 03/30/2004 through 09/29/2004

Condition 29: Compliance Demonstration
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.8



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Item 29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Sealers used for the surface coating of wood products may contain a maximum of 5.6 pounds of volatile organic compounds per gallon of coating (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: WOOD COATINGS - SEALERS

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 5.6 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 10/29/2004 for the period 03/30/2004 through 09/29/2004

Condition 30: solids as applied

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(c)

Item 30.1:

This Condition applies to Emission Unit: 0-00001

Process: P01

Item 30.2:

Control strategies utilizing an air cleaning device must determine the required overall removal efficiency on a solids as applied basis as per Part 228.2(b)(22). Using the appropriate coating parameters and VOC limits the overall removal efficiency required is the lesser of the value calculated or 85 percent.

Condition 31: Control requirement

Effective between the dates of 03/30/2004 and Permit Expiration Date



Applicable Federal Requirement: 6NYCRR 228.5(f)

Item 31.1:

This Condition applies to Emission Unit: 0-00001
Process: P01

Item 31.2:

The owner or operator must follow notification requirements, protocol requirements and test procedures of 6NYCRR Part 202 for testing and monitoring. Depending upon the conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 must be used when measuring volatile organic compound (VOC) concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

- (a) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography,
- (b) Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon,
- (c) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.
- (d) Methods not listed above must be approved in advance by the commissioner's representative and the United States Environmental Protection Agency.

Condition 32: no open containers
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(a)

Item 32.1:

This Condition applies to Emission Unit: 0-00001
Process: P01

Item 32.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or coating removal.

Condition 33: no open containers
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(b)

Item 33.1:

This Condition applies to Emission Unit: 0-00001
Process: P01



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Item 33.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or coating removal.

Condition 34: equipment cleanup
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(c)

Item 34.1:

This Condition applies to Emission Unit: 0-00001
Process: P01

Item 34.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.

Condition 35: no open containers
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(d)

Item 35.1:

This Condition applies to Emission Unit: 0-00001
Process: P01

Item 35.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate.

Condition 36: no open containers
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(e)

Item 36.1:

This Condition applies to Emission Unit: 0-00001
Process: P01

Item 36.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

Condition 37: Work Practice Standards - Application equipment



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requirements

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.803, Subpart JJ

Item 37.1:

This Condition applies to Emission Unit: 0-00001
Process: P01

Item 37.2:

Owner/operator shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

- 1) To apply finishing materials that have a VOC content no greater than 1 lb VOC/lb solids, as applied;
- 2) For touchup and repair under the following conditions: i) The touchup and repair occurs after completion of the finishing operation; or ii) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2 gallons.
- 3) When the spray gun is aimed and triggered automatically, not manually;
- 4) When emissions from the finishing application station are directed to a control device;
- 5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5% of the total gallons of finishing material used during that semiannual period; or
- 6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology.

Condition 38: New facility (finishing)- using compliant coatings

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.804, Subpart JJ

Item 38.1:

This Condition applies to Emission Unit: 0-00001
Process: P01

Item 38.2:

To comply with 40CFR63 Subpart JJ emission limits for finishing operations by using compliant coatings, the owner or operator must:

1. Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight.



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2. Demonstrate that each washcoat, basecoat and enamel purchased pre made has a VHAP content of no more than 0.8 kg VHAP/kg solids (lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight.

3. Demonstrate that each washcoat, basecoat, and enamel formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.

The owner or operator must submit an initial compliance status report stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels and thinners, as applicable, are being used by the affected source.

Condition 39: Compliance Demonstration
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.806(b), Subpart JJ

Item 39.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: P01

Item 39.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owner/operator of a source subject to the emission limits in 40CFR63.802 shall maintain records of the certified product data sheet for each strippable spray booth coating, and the VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 11/13/2004 for the period 03/30/2004 through 09/29/2004

Condition 40: Reporting Requirements - Compliance status report
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.807(b), Subpart JJ

Item 40.1:

This Condition applies to Emission Unit: 0-00001

Process: P01



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Item 40.2:

Owner/operator demonstrating compliance in accordance with 40CFR63.804(f)(1),(2),(3),(5),(7), and (8) shall submit the compliance status report required by 40CFR63.9(h) no later than 60 days after the compliance date. The report shall contain the information in 40CFR63.804(f)(1),(2),(3),(5),(7), and (8).

**Condition 41: Reporting Requirements - Periodic reports
Effective between the dates of 03/30/2004 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.807(c), Subpart JJ

Item 41.1:

This Condition applies to Emission Unit: 0-00001
Process: P01

Item 41.2:

Owner/operator demonstrating compliance with 40CFR63.804(g)(1),(2),(3),(5),(7), and (8) shall submit a report covering the previous 6 months of wood furniture manufacturing operations. The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date. Subsequent reports shall be submitted 30 calendar days after the end of each 6-month following the first report. The reports shall include the information required by 40CFR63.804(g)(1),(2),(3),(5),(7), and (8), a statement of whether the affected source was in compliance or noncompliance, and if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.

**Condition 42: Reporting Requirements - notification of increase in VHAP
usage
Effective between the dates of 03/30/2004 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.807(e), Subpart JJ

Item 42.1:

This Condition applies to Emission Unit: 0-00001
Process: P01

Item 42.2:

If the owner/operator is required to submit a written notification under 40CFR63.803(l)(4), owner/operator shall include one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

**Condition 43: Existing facility- Emission limit for contact adhesives
not meeting flammability requirements
Effective between the dates of 03/30/2004 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.802, Subpart JJ

Item 43.1:



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This Condition applies to Emission Unit: 0-00001

Process: P01

Emission Source: 00CDO

Item 43.2:

For all contact adhesives which are used in products not subject to upholstered seating flammability requirements, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids). This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.

The owner or operator must state in their initial compliance status report that compliant contact adhesives are being used.

Condition 44: New facility- Emission limit for strippable spray booth coatings

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.802, Subpart JJ

Item 44.1:

This Condition applies to Emission Unit: 0-00001

Process: P01

Emission Source: 00CDO

Item 44.2:

HAP emissions from strippable spray booth coatings are to be limited by using coatings that contain no more than 0.8 kg VOC/ kg solids (0.8 lb VOC/ lb solids), as applied

Condition 45: Existing facility- Emission limit for contact adhesives not meeting flammability requirements

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.802, Subpart JJ

Item 45.1:

This Condition applies to Emission Unit: 0-00001

Process: P01

Emission Source: 00EPL

Item 45.2:

For all contact adhesives which are used in products not subject to upholstered seating flammability requirements, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids). This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.

The owner or operator must state in their initial compliance status report that compliant contact adhesives are being used.

Condition 46: Existing facility- Emission limit for contact adhesives not meeting flammability requirements



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Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.802, Subpart JJ

Item 46.1:

This Condition applies to Emission Unit: 0-00001

Process: P01

Emission Source: 00IRO

Item 46.2:

For all contact adhesives which are used in products not subject to upholstered seating flammability requirements, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids). This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.

The owner or operator must state in their initial compliance status report that compliant contact adhesives are being used.

**Condition 47: Existing facility- Emission limit for contact adhesives
not meeting flammability requirements**

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.802, Subpart JJ

Item 47.1:

This Condition applies to Emission Unit: 0-00001

Process: P01

Emission Source: 00SB1

Item 47.2:

For all contact adhesives which are used in products not subject to upholstered seating flammability requirements, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids). This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.

The owner or operator must state in their initial compliance status report that compliant contact adhesives are being used.

**Condition 48: Existing facility- Emission limit for contact adhesives
not meeting flammability requirements**

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.802, Subpart JJ

Item 48.1:

This Condition applies to Emission Unit: 0-00001

Process: P01

Emission Source: 00SB2

Item 48.2:



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Facility DEC ID: 1472803101

For all contact adhesives which are used in products not subject to upholstered seating flammability requirements, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids). This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.

The owner or operator must state in their initial compliance status report that compliant contact adhesives are being used.

Condition 49: Existing facility- Emission limit for contact adhesives not meeting flammability requirements Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.802, Subpart JJ

Item 49.1:

This Condition applies to Emission Unit: 0-00001

Process: P01

Emission Source: 00SB3

Item 49.2:

For all contact adhesives which are used in products not subject to upholstered seating flammability requirements, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids). This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.

The owner or operator must state in their initial compliance status report that compliant contact adhesives are being used.

Condition 50: Existing facility- Emission limit for contact adhesives not meeting flammability requirements Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.802, Subpart JJ

Item 50.1:

This Condition applies to Emission Unit: 0-00001

Process: P01

Emission Source: 00SB4

Item 50.2:

For all contact adhesives which are used in products not subject to upholstered seating flammability requirements, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids). This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.

The owner or operator must state in their initial compliance status report that compliant contact adhesives are being used.

Condition 51: solids as applied



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Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(c)

Item 51.1:

This Condition applies to Emission Unit: 0-00002
Process: P02

Item 51.2:

Control strategies utilizing an air cleaning device must determine the required overall removal efficiency on a solids as applied basis as per Part 228.2(b)(22). Using the appropriate coating parameters and VOC limits the overall removal efficiency required is the lesser of the value calculated or 85 percent.

Condition 52: Compliance Demonstration

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 52.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00002
Process: P02

Item 52.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the department. Records must be maintained at the facility for a period of five years.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 53: Control requirement

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(f)



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Item 53.1:

This Condition applies to Emission Unit: 0-00002
Process: P02

Item 53.2:

The owner or operator must follow notification requirements, protocol requirements and test procedures of 6NYCRR Part 202 for testing and monitoring. Depending upon the conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 must be used when measuring volatile organic compound (VOC) concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

- (a) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography,
- (b) Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon,
- (c) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.
- (d) Methods not listed above must be approved in advance by the commissioner's representative and the United States Environmental Protection Agency.

Condition 54: no open containers
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(a)

Item 54.1:

This Condition applies to Emission Unit: 0-00002
Process: P02

Item 54.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or coating removal.

Condition 55: no open containers
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(b)

Item 55.1:

This Condition applies to Emission Unit: 0-00002
Process: P02

Item 55.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or coating removal.

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Condition 56: equipment cleanup
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(c)

Item 56.1:

This Condition applies to Emission Unit: 0-00002
Process: P02

Item 56.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.

Condition 57: no open containers
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(d)

Item 57.1:

This Condition applies to Emission Unit: 0-00002
Process: P02

Item 57.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate.

Condition 58: no open containers
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10(e)

Item 58.1:

This Condition applies to Emission Unit: 0-00002
Process: P02

Item 58.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

Condition 59: Work Practice Standards - Cleaning and washoff solvent accounting system
Effective between the dates of 03/30/2004 and Permit Expiration Date



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Applicable Federal Requirement: 40CFR 63.803, Subpart JJ

Item 59.1:

This Condition applies to Emission Unit: 0-00002
Process: P02

Item 59.2:

Owner/operator shall develop an organic HAP solvent accounting form to record:

- 1) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 40CFR63.801;
- 2) The number of pieces washed off, and the reason for the washoff; and
- 3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

Condition 60: New facility (adhesives)- using compliant contact adhesives
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.804, Subpart JJ

Item 60.1:

This Condition applies to Emission Unit: 0-00002
Process: P02

Item 60.2:

Contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, are to be used at all times.

The owner must include a statement in the initial compliance status report which certifies that compliant contact adhesives are being used at the facility.

Condition 61: Compliance Demonstration
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.806(b), Subpart JJ

Item 61.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00002
Process: P02

Item 61.2:

Compliance Demonstration shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owner/operator of a source that is subject to the emission limits in 40CFR63.802 shall maintain records of the certified product data sheet for each contact adhesive, and the VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied of each contact adhesive.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 11/13/2004 for the period 03/30/2004 through 09/29/2004

**Condition 62: Reporting Requirements - Compliance status report
Effective between the dates of 03/30/2004 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.807(b), Subpart JJ

Item 62.1:

This Condition applies to Emission Unit: 0-00002

Process: P02

Item 62.2:

Owner/operator demonstrating compliance in accordance with 40CFR63.804(f)(1),(2),(3),(5),(7), and (8) shall submit the compliance status report required by 40CFR63.9(h) no later than 60 days after the compliance date. The report shall contain the information in 40CFR63.804(f)(1),(2),(3),(5),(7), and (8).

**Condition 63: Reporting Requirements - Periodic reports
Effective between the dates of 03/30/2004 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.807(c), Subpart JJ

Item 63.1:

This Condition applies to Emission Unit: 0-00002

Process: P02

Item 63.2:

Owner/operator demonstrating compliance with 40CFR63.804(g)(1),(2),(3),(5),(7), and (8) shall submit a report covering the previous 6 months of wood furniture manufacturing operations. The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date. Subsequent reports shall be submitted 30 calendar days after the end of each 6-month following the first report. The reports shall include the information required by 40CFR63.804(g)(1),(2),(3),(5),(7), and (8), a statement of whether the affected source was in compliance or noncompliance, and if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.

Condition 64: Reporting Requirements - notification of increase in VHAP

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usage

Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.807(e), Subpart JJ

Item 64.1:

This Condition applies to Emission Unit: 0-00002
Process: P02

Item 64.2:

If the owner/operator is required to submit a written notification under 40CFR63.803(1)(4), owner/operator shall include one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

**Condition 65: Existing facility- Emission limit for contact adhesives
not meeting flammability requirements
Effective between the dates of 03/30/2004 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.802, Subpart JJ

Item 65.1:

This Condition applies to Emission Unit: 0-00002
Process: P02 Emission Source: BNKS1

Item 65.2:

For all contact adhesives which are used in products not subject to upholstered seating flammability requirements, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids). This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.

The owner or operator must state in their initial compliance status report that compliant contact adhesives are being used.

**Condition 66: Existing facility- Emission limit for contact adhesives
not meeting flammability requirements
Effective between the dates of 03/30/2004 and Permit Expiration Date**

Applicable Federal Requirement: 40CFR 63.802, Subpart JJ

Item 66.1:

This Condition applies to Emission Unit: 0-00002
Process: P02 Emission Source: BNKS2

Item 66.2:

For all contact adhesives which are used in products not subject to upholstered seating flammability requirements, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb

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VHAP/lb solids). This limit does not apply to aerosol adhesives or contact adhesives applied to nonporous substrates.

The owner or operator must state in their initial compliance status report that compliant contact adhesives are being used.



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6NYCRR Part 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 B: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

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

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



law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 67: Contaminant List
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 67.1:

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 68: Unavoidable noncompliance and violations
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 68.1:

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



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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 69: Emission Unit Definition
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 69.1:

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

Emission Unit: 0-00001

Emission Unit Description:

SPRAY PAINTING. FOUR PAINT SPRAY BOOTHS EXHAUSTING THROUGH REPLACEABLE FILTERS AND EACH INDIVIDUALLY DUCTED TO THE OUTSIDE; ONE EXCLOSED PAINT SPRAY LINE EXHAUSTING THROUGH REPLACEABLE FILTERS AND DUCTED TO THE OUTSIDE; A GAS-FIRED, CONVEYOR DRYING OVEN F OLLOWING THE ENCLOSED PAINT LINE; AND ONE NATURAL GAS-FIRED, INFRARED/LOW TEMPERATURE DRYING OVEN (EXEMPT UNDER 6 NYCRR 201-3.2(C)(1).

Building(s): M

Item 69.2:

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

Emission Unit: 0-00002

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Emission Unit Description:

LAMINATING AND ASSEMBLY. WOOD STRUCTURES ARE GLUED TOGETHER AND/OR VENEERS ARE ATTACHED TO WOODEN COMPONENTS USING AN EDGE BANDER WITH HOT MELT GLUES; OTHER ADHESIVES ARE APPLIED BY HAND-HELD APPLICATORS USED IN SMALL AMOUNTS IN OPEN, LIMITED AREAS - EMISSIONS ARE FUGITIVE - OR IN THE LAMINATING BOOTH DESIGNED TO CAPTURE EMISSIONS.

Building(s): M

Condition 70: Compliance Demonstration
Effective between the dates of 03/30/2004 and Permit Expiration Date

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

Item 70.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 70.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

CAS No.: 0NY075-00-0

Name: PARTICULATES

CAS No.: 007446095

Name: Sulfur Dioxide

CAS No.: 00630-08-0

CARBON MONOXIDE

CAS No.: 07439-92-1

Name : LEAD

CAS No.: 0NY210-00-0

Name: OXIDES OF NITROGEN

Monitoring Frequency: MONTHLY



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Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2004.

Subsequent reports are due every 3 calendar month(s).

Condition 71: Air pollution prohibited
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 71.1:

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 72: Idling of Diesel Trucks Limited
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 217-3.2

Item 72.1:

No person who owns, operates or leases a bus or truck, the motive power for which is provided by a diesel engine or who owns, leases or occupies land and has the actual or apparent dominion or control over the operation of a bus or truck present on such land, the motive power for which said bus or truck is provided by a diesel engine, shall allow or permit the diesel engine of such bus or truck to idle for more than five consecutive minutes when the bus or truck is not in motion, except as otherwise permitted by 6 NYCRR Subpart 217-3.3.

Condition 73: Exceptions
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 217-3.3

Item 73.1:

The prohibitions of section 217-3.2 shall not apply when:

(a) A bus or truck is forced to remain motionless because of the traffic conditions over which the operator thereof has no control.

(b) Regulations adopted by Federal, State or local agencies having jurisdiction require the maintenance of a specific temperature for passenger comfort. The idling time specified in section 217-3.2 may be increased, but only to the extent necessary to comply with such regulations.

(c) A diesel engine is being used to provide power for an auxiliary purpose, such as loading,



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discharging, mixing or processing cargo; controlling cargo temperature; construction; lumbering; oil or gas well servicing; farming; or when operation of the engine is required for the purpose of maintenance.

(d) Fire, police and public utility trucks or other vehicles are performing emergency services.

(e) Trucks owned or operated by persons engaged in mining and quarrying are used within the confines of such person's property.

(f) A truck is to remain motionless for a period exceeding two hours, and during which period the ambient temperature is continuously below 25°F.

(g) A heavy duty diesel vehicle, as defined in subdivision 217-5.1(o), that is queued for or is undergoing a state authorized periodic or roadside diesel emissions inspection pursuant to Subpart 217-5.

(h) A hybrid electric vehicle, as defined in subdivision 217-5.1(r), idling for the purpose of providing energy for battery or other form of energy storage recharging.

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

**Condition 74: Emission Point Definition By Emission Unit
Effective between the dates of 03/30/2004 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 201-5

Item 74.1:

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

Emission Unit: 0-00001

Emission Point: 00001

Height (ft.): 29 Diameter (in.): 34
NYTMN (km.): 4514.207 NYTME (km.): 651.787 Building: M

Emission Point: 00002

Height (ft.): 29 Diameter (in.): 34
NYTMN (km.): 4514.207 NYTME (km.): 651.787 Building: M

Emission Point: 00003

Height (ft.): 29 Diameter (in.): 34
NYTMN (km.): 4514.207 NYTME (km.): 651.787 Building: M

Emission Point: 00004

Height (ft.): 29 Diameter (in.): 34
NYTMN (km.): 4514.207 NYTME (km.): 651.787 Building: M

Emission Point: 00005



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Height (ft.): 31 Diameter (in.): 13
NYTMN (km.): 4514.207 NYTME (km.): 651.787 Building: M

Emission Point: 00006
Height (ft.): 31 Diameter (in.): 14
NYTMN (km.): 4514.207 NYTME (km.): 651.787 Building: M

Item 74.2:

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

Emission Unit: 0-00002

Emission Point: 00007
Height (ft.): 31 Diameter (in.): 14
NYTMN (km.): 4514.207 NYTME (km.): 651.787 Building: M

Condition 75: Process Definition By Emission Unit
Effective between the dates of 03/30/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 75.1:

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

Emission Unit: 0-00001
Process: P01 Source Classification Code: 4-02-001-10
Process Description:

PAINT SPRAYING MANUALLY IN FOUR SPRAY BOOTHS, EXHAUST CONTAINED BY REPLACABLE FILTERS; ALSO PAINT SPRAYING IN AUTOMATIC ENCLOSED PAINT LINE (EPL). THE AUTOMATIC PAINT LINE CONTAINS A DEDICATED CONVEYORED, GAS-FIRED DRYING OVEN (CDO). THIS PROCESS ALSO CONTAINS A DEDICATED CONVEYORED, GAS-FIRED DRYING OVEN (CDO). THIS PROCESS ALSO CONTAINS A STAND ALONE GAS-FIRED, INFRARED DRYING OVEN (IRO) WITH NO EMISSION POINT.

Emission Source/Control: 00SB1 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00SB2 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00SB3 - Control
Control Type: MAT OR PANEL FILTER

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Emission Source/Control: 00SB4 - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 00CDO - Process

Emission Source/Control: 00EPL - Process

Emission Source/Control: 00IRO - Process

Item 75.2:

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

Emission Unit: 0-00002

Process: P02

Source Classification Code: 4-02-007-10

Process Description:

veneers are laminated onto wooden substrates, and other wooden components are glued together. Edge pieces are run through an edge bander (SCMI, Model Selecta 25) that uses hot melt glue (no VOCs); other adhesives including rubber cement and standard wood glue are applied with hand-held applicators. Any VOC emissions are fugitive with no specific emissions points correlating to any specific emission sources.

Emission Source/Control: BNKS1 - Process

Emission Source/Control: BNKS2 - Process