

New York State Department of Environmental Conservation
Facility DEC ID: 1473000001



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 1-4730-00001/00011
Effective Date: 06/26/2006 Expiration Date: 06/25/2011

Permit Issued To: ADCHEM CORPORATION
1852 OLD COUNTRY ROAD
RIVERHEAD, NY 11901

Contact: ADCHEM CORPORATION
1852 OLD COUNTRY ROAD
RIVERHEAD, NY 11901
(631) 727-6000

Facility: ADCHEM CORPORATION
1852 OLD COUNTRY RD
RIVERHEAD, NY 11901

Contact: JOHN J PUF AHL
ADCHEM CORPORATION
1852 OLD COUNTRY ROAD
RIVERHEAD, NY 11901
(631) 727-6000

Description:

Description:

NATURE OF THE BUSINESS AT THE FACILITY:

The Adchem Corporation (Adchem) located in Riverhead, New York is a pressure sensitive tape and label surface coating facility. This facility produces pressure sensitive tapes and labels that adhere to a surface on contact without wetting, heating or adding a curing agent. The pressure sensitive label and tape industry is subcategory of paper coating. Emissions from solvent based coating operations are controlled by incinerators.

(Primary SIC) - 2672

TYPE OF EQUIPMENT AND OPERATIONS AT THE FACILITY:

Air pollution control equipment at the facility includes one Regenerative Thermal Oxidizer and one Recuperative Thermal Oxidizer to destroy volatile organic compounds. The facility is also equipped with a cyclone and bag filter particulate control, an evaporator to reduce the volume of air compressor condensate and other non hazardous liquids, primarily residual water based coatings. The hot melt mixer is equipped with a woven filter, cartridge filter and carbon filter. The facility employs continuous monitoring of the ceramic bed temperature rise for the regenerative oxidizer, combustion temperature for the recuperative oxidizer, and stack exit temperature. Thermal oxidizers use natural gas as auxiliary fuel during start-up, shut down and malfunction.

New York State Department of Environmental Conservation
Facility DEC ID: 1473000001



AIR PERMIT APPLICABILITY:

The Adchem is permitted under the federal regulation 40 CFR 60, Subpart RR, the pressure sensitive tape and label surface coating operation and the New York State regulation 6NYCRR Part 228 (Surface Coating).

OCCURRENCE OF CAPPING:

The facility is capped below 100 tons per year of VOC based on monthly rolling total to cap out of 6NYCRR Part 231-1.2(a)(4).

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

Facility Level

Submission of Applications for Permit Modification or Renewal-REGION 1

HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

Condition 3: Applications for Permit Renewals 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:



New York State Department of Environmental Conservation
Facility DEC ID: 1473000001

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

Condition 4: Permit Modifications, Suspensions 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.

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

Condition 5: Submission of Applications for Permit Modification or Renewal-REGION 1 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 1 Headquarters
Division of Environmental Permits
SUNY Campus, Loop Road, Building 40
Stony Brook, NY 11790-2356
(631) 444-0365



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: ADCHEM CORPORATION
1852 OLD COUNTRY ROAD
RIVERHEAD, NY 11901

Facility: ADCHEM CORPORATION
1852 OLD COUNTRY RD
RIVERHEAD, NY 11901

Authorized Activity By Standard Industrial Classification Code:
2672 - PAPER COATED AND LAMINATED, NEC

Permit Effective Date: 06/26/2006

Permit Expiration Date: 06/25/2011



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
 - 2 6NYCRR 201-6.5(a)(7): Fees
 - 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
 - 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
 - 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
 - 6 6NYCRR 201-6.5(e): Compliance Certification
 - 7 6NYCRR 202-2.1: Compliance Certification
 - 8 6NYCRR 202-2.5: Recordkeeping requirements
 - 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
 - 10 6NYCRR 200.7: Maintenance of Equipment
 - 11 6NYCRR 201-1.7: Recycling and Salvage
 - 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
 - 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
 - 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
 - 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
 - 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
 - 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
 - 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
 - 19 6NYCRR 202-1.1: Required Emissions Tests
 - 20 6NYCRR 211.3: Visible Emissions Limited
 - 21 40CFR 68: Accidental release provisions.
 - 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
 - 23 6NYCRR 201-6: Emission Unit Definition
 - 24 6NYCRR 201-6.5(g): Non Applicable requirements
 - 25 6NYCRR 201-7: Facility Permissible Emissions
 - *26 6NYCRR 201-7: Capping Monitoring Condition
 - 27 6NYCRR 228.1(b)(1): NYC metro area, listed in table 1 & 2 of part 228, compliance upon start up
 - 28 6NYCRR 228.1(d): Will remain subject
 - 29 6NYCRR 228.4: Compliance Certification
 - 30 6NYCRR 228.5(a): Compliance Certification
 - 31 6NYCRR 228.5(j): Compliance Certification
 - 32 6NYCRR 228.6(a): Prohibition of Sale
 - 33 40CFR 64: Compliance Certification
- Emission Unit Level**
- 34 6NYCRR 201-6: Emission Point Definition By Emission Unit
 - 35 6NYCRR 201-6: Process Definition By Emission Unit

EU=U-00001



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

- 36 6NYCRR 201-6.5(f): Compliance Certification
- 37 6NYCRR 228.5(d): Department access to obtain samples.
- 38 6NYCRR 228.5(e)(2): Demonstration of efficiency other than
VOC/solvent recovery
- 39 40CFR 60.442(a)(2)(i), NSPS Subpart RR: Compliance Certification
- 40 40CFR 60.445(a), NSPS Subpart RR: Compliance Certification
- 41 40CFR 60.445(e), NSPS Subpart RR: Compliance Certification
- 42 40CFR 60.445(g), NSPS Subpart RR: Compliance Certification
- 43 40CFR 60.446(a), NSPS Subpart RR: Test methods for determination of
coating VOC content
- 44 40CFR 64: Compliance Certification
- 45 40CFR 64: Compliance Certification
- 46 40CFR 64: Compliance Certification

EU=U-00001,EP=00001,Proc=101,ES=000I2

- 47 6NYCRR 228.5(g)(1): Compliance Certification
- 48 40CFR 60.443(e), NSPS Subpart RR: Compliance Certification

EU=U-00001,EP=00002,Proc=101,ES=000I2

- 49 40CFR 60.443(e), NSPS Subpart RR: Compliance Certification

EU=U-00001,EP=00002,Proc=101,ES=000I3

- 50 6NYCRR 228.5(g)(1): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 51 ECL 19-0301: Contaminant List
- 52 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 53 6NYCRR 211.2: Air pollution prohibited

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: 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 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 Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

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

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

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

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

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

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

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

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

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

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

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



Act;

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

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

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

Item L: Permit Exclusion - ECL 19-0305

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

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

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

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

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

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 3.1:

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

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

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

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



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

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



following:

i. Compliance certifications shall contain:

- the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
- and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

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

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

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

NYSDEC
SUNY Campus
Building 40
Stony Brook, NY 11790-2356

The address for the BQA is as follows:

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

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2007.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Emission statements shall be submitted on or before April
15th each year for emissions of the previous calendar
year.

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

Condition 8: Recordkeeping requirements
Effective between the dates of 06/26/2006 and 06/25/2011



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 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:

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

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage
Effective between the dates of 06/26/2006 and 06/25/2011

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:

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 the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 06/26/2006 and 06/25/2011

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

Item 13.1:

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 this Subpart. 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 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.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 06/26/2006 and 06/25/2011

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

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. 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 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.

Condition 15: Standard Requirement - Provide Information



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 15.1:

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

Condition 16: General Condition - Right to Inspect

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 16.1:

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

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 17.1:

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

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



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

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

Condition 18: Off Permit Changes
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 18.1:

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

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

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 211.3

Item 20.1:



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

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

Condition 21: Accidental release provisions.
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 68

Item 21.1:

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

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:

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

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

Condition 23: Emission Unit Definition



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:

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

Emission Unit: U-00001

Emission Unit Description:

Coating lines 4 (CL4) and 5 (CL5) produce pressure sensitive tapes and labels. Emissions from solvent based coatings are controlled by incineration. Coating line 3 (CL3) is a hot melt coater. An enclosed buffer (BUF1) is equipped with a cyclone (C1) and a bag filter (BF1) for 99% particulate control. An evaporator (EVAP1) is used to reduce the volume of air compressor condensate and other non hazardous liquids, primarily residual water based coatings. A hot melt mixer (MT1) is equipped with a woven filter (F1), a cartridge filter (DC1) and a carbon filter (AF2).

Building(s): MAIN

Item 23.2:

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

Emission Unit: U-00002

Emission Unit Description:

The mixing, dispensing, and storage of adhesives containing VOCs. Process equipment includes drum dispensing equipment (DISP1) and adhesive mix tanks (AMT1 and AMT2).

Building(s): MIX

Condition 24: Non Applicable requirements

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(g)

Item 24.1:

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

Condition 25: Facility Permissible Emissions

Effective between the dates of 06/26/2006 and 06/25/2011



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Applicable Federal Requirement: 6NYCRR 201-7

Item 25.1:

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

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

CAS No: 0NY998-00-0

PTE: 190,000 pounds per year

Name: VOC

Condition 26: Capping Monitoring Condition

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-7

Item 26.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 231-1.2(a)(4)

Item 26.2:

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

Item 26.3:

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

Item 26.4:

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

Item 26.5:

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

Item 26.6:

The Compliance Certification activity will be performed for the Facility.

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



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

Item 26.7:

Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Record monthly usage of all coatings and cleaning solvents. Record monthly amounts of VOC emitted and verify that annual VOC emissions, rolled monthly, are below 95 tons.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 27: NYC metro area, listed in table 1 & 2 of part 228, compliance upon start up Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 228.1(b)(1)

Item 27.1:

Unless otherwise noted in this permit; a coating line listed in table 1 of section 228.7 or table 2 of 6 NYCRR Part 228; which is located in the New York City metropolitan area; must comply with all provisions applicable to that coating line upon start-up

Condition 28: Will remain subject Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 228.1(d)

Item 28.1:

Any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228 will remain subject to these provisions even if the annual potential to emit VOCs for the facility later falls below the thresholds set forth in 228.1(b).

Condition 29: Compliance Certification Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 228.4



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to 6NYCRR Part 228.4. 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 at the monitoring frequency stated below 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 (this may be zero percent opacity for many or all emission sources) and in compliance with 228.4 are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

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

Records of these observations, investigations, and corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: See monitoring description.



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Monitoring Frequency: WEEKLY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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

Condition 30: Compliance Certification

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the Department and, upon request, these records must be submitted to the Department. Any facility required to perform the overall removal efficiency calculation, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance must be provided to the Department in a format acceptable to the Department.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Condition 31: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 228.5(j)

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Any information or record showing noncompliance with the requirements of 6NYCRR Part 228 must be reported to the Department within 30 days following notice or generation of the information or record.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 32: Prohibition of Sale
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 228.6(a)

Item 32.1:

(A) No person shall sell, specify, or require for use the application of a coating on a part or product at a facility with a coating line described in table 1 or 2 in section 228.7 or 228.8 of 6NYCRR Part 228 if such use is prohibited by any of the provisions of this Part. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at this facility. This prohibition shall not apply to the following:

(1) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in tables 1 and 2 of sections 228.7 or 228.8 of 6NYCRR Part 228;

(2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in section 228.3(d) of 6NYCRR Part 228; and

(3) coatings utilized at surface coating lines that have been granted variances for reasons of technological and economic feasibility per section 228.3(e) of 6NYCRR Part 228.



Condition 33: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 64

Item 33.1:

The Compliance Certification activity will be performed for the Facility.

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility is subject to the Compliance Assurance Monitoring Rule (CAM Rule). The owner or operator of this facility must submit a plan to the Department for its review and approval showing how they will comply with this rule. The plan must include the following:

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

The owner or operator of this facility shall submit an annual report of the monitoring required above. The report shall include the following:

- summary of information on the number, duration and cause (including unknown cause) of excursions or exceedances, as applicable, and the corrective actions taken;
- summary information on the number, duration and cause (including unknown cause) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks if applicable); and
- a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period. Upon completion of a QIP, the owner or operator



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

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

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

**Condition 34: Emission Point Definition By Emission Unit
Effective between the dates of 06/26/2006 and 06/25/2011**

Applicable Federal Requirement: 6NYCRR 201-6

Item 34.1:

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

Emission Unit: U-00001

Emission Point: 00001

Height (ft.): 52 Diameter (in.): 40

NYTMN (km.): 4531.724 NYTME (km.): 697.033

Emission Point: 00002

Height (ft.): 38 Diameter (in.): 36

NYTMN (km.): 4531.724 NYTME (km.): 697.033

Emission Point: 00007

Height (ft.): 48 Diameter (in.): 42

NYTMN (km.): 4531.724 NYTME (km.): 697.033

Emission Point: 00008

Height (ft.): 23 Diameter (in.): 8

NYTMN (km.): 4531.724 NYTME (km.): 697.033

Emission Point: 00009

Height (ft.): 25 Diameter (in.): 16

NYTMN (km.): 4531.724 NYTME (km.): 697.033

Emission Point: 00011

Height (ft.): 23 Diameter (in.): 8

NYTMN (km.): 4531.724 NYTME (km.): 697.033

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



Emission Point: 00012
Height (ft.): 22 Diameter (in.): 5
NYTMN (km.): 4531.724 NYTME (km.): 697.033

Item 34.2:

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

Emission Unit: U-00002

Emission Point: 00003
Height (ft.): 31 Diameter (in.): 2
NYTMN (km.): 4531.724 NYTME (km.): 697.033

Emission Point: 00004
Height (ft.): 31 Diameter (in.): 8
NYTMN (km.): 4531.724 NYTME (km.): 697.033

Emission Point: 00005
Height (ft.): 8 Length (in.): 24 Width (in.): 12
NYTMN (km.): 4531.724 NYTME (km.): 697.033

Emission Point: 00006
Height (ft.): 33 Diameter (in.): 14
NYTMN (km.): 4531.724 NYTME (km.): 697.033

**Condition 35: Process Definition By Emission Unit
Effective between the dates of 06/26/2006 and 06/25/2011**

Applicable Federal Requirement: 6NYCRR 201-6

Item 35.1:

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

Emission Unit: U-00001
Process: 101 Source Classification Code: 4-02-007-01

Process Description:

Coating line 4 (CL4) produces pressure sensitive tapes and labels. Coatings vary according to customer requirements. VOC emissions are controlled by incinerator I3 (EP00002).

Coating line 5 (CL5) is a solvent based coating line that will have a thermal oxidizer I2 (EP00001) for control of VOC emissions.

Both coating lines CL4 and CL5 are capable of using



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

incinerator I2 as the control device. Adchem intends to reserve the operational flexibility to have incinerator I2 receive emissions from coating lines CL4 and CL5 for future provided emission test using this scenario is performed in accordance with an approved protocol.

The control equipment is not required to be operating at times when the emissions from CL4 and CL5 are due solely to the application of water based coatings. The control equipment shall be operating when solvent based cleaning products are being used.

Emission Source/Control: 000I2 - Control
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 000I3 - Control
Control Type: DIRECT FLAME AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00CL4 - Process

Emission Source/Control: 00CL5 - Process

Item 35.2:

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

Emission Unit: U-00001
Process: 102 Source Classification Code: 4-02-007-01
Process Description:
The hot melt coater (CL3) and the hot melt mixer (MT1) generate negligible emissions.

Emission Source/Control: 000C1 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 000F1 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00AF1 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00AF2 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00BF1 - Control
Control Type: FABRIC FILTER



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Emission Source/Control: 00DC1 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00CL3 - Process

Emission Source/Control: 00MT1 - Process

Emission Source/Control: 0BUF1 - Process

Emission Source/Control: EVAP1 - Process

Item 35.3:

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

Emission Unit: U-00002

Process: 103

Source Classification Code: 4-02-007-06

Process Description:

The adhesives mix building operations include adhesive mixing in two 660 gallon jacketed mix tanks, drum dispensing of adhesive, and drum storage. Low point ventilation at several locations is provided for safety.

Emission Source/Control: 00LP1 - Process

Emission Source/Control: 00LP2 - Process

Emission Source/Control: 00LP3 - Process

Emission Source/Control: 0AMT1 - Process

Emission Source/Control: 0AMT2 - Process

Emission Source/Control: DISP1 - Process

Condition 36: Compliance Certification

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 201-6.5(f)

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 36.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

OPERATIONAL FLEXIBILITY:

Both coating lines CL4 and CL5 are capable of using the thermal oxidizer I2 (EP 00001) as the control device. Adchem intends to reserve the operational flexibility to have incinerator I2 receive emissions from coating lines CL4 and CL5 for future use provided emission test using this scenario is performed in accordance with an approved protocol.

A performance test must be performed to determine the overall capture and destruction efficiency of the thermal oxidizer I2 (EP 00001) using both coating lines CL4 and CL5 as process sources.

A test/operational flexibility protocol must be submitted to the Division of Air Resources for approval within 60 days prior to initiating this Alternate Operating Scenario to direct emissions from both coating lines (CL4 and CL5) to the thermal oxidizer I2 (EP 00001). This protocol must identify the maximum permissible operating conditions that will be measured during the test to include in an Operational Flexible Plan and the test report. The final Plan and test report must be submitted to the Department for approval within 30 days after the completion of the test, which must contain, but not limited to, lower incinerator temperature limit, upper temperature limit, VOC loading from both lines, outlet emissions etc.

Manufacturer Name/Model Number: AWS18

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 37: Department access to obtain samples.
Effective between the dates of 06/26/2006 and 06/25/2011**

Applicable Federal Requirement: 6NYCRR 228.5(d)

Item 37.1:

This Condition applies to Emission Unit: U-00001

Item 37.2:



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Representatives of the Department must be permitted during reasonable business hours, to obtain coating samples for the purpose of determining compliance with 6NYCRR Part 228.

Condition 38: Demonstration of efficiency other than VOC/solvent recovery
Effective between the dates of 06/26/2006 and 06/25/2011

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

Item 38.1:

This Condition applies to Emission Unit: U-00001

Item 38.2:

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 to determine the overall removal efficiency. For control equipment other than VOC/solvent recovery, this determination must include provisions to determine both the efficiency of the capture system and the control equipment.

Condition 39: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 60.442(a)(2)(i), NSPS Subpart RR

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

On or after the date on which the performance test required by 40 CFR 60.8 has been completed, the facility shall demonstrate a 90 percent overall VOC emission reduction as calculated over a calendar month.

Parameter Monitored: VOC

Lower Permit Limit: 90 percent

Reference Test Method: EPA Approved

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 40: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 60.445(a), NSPS Subpart RR

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

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

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of an affected facility subject to this subpart shall maintain a calendar month record of all coatings used and the results of the reference test method specified in 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 60.445(e), NSPS Subpart RR

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

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

Item 41.2:



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility controlled by a thermal incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases. The monitoring device shall have an accuracy of the greater of (+) or (-) 0.75 percent of the temperature being measured expressed in degrees Celsius or (+) or (-) 2.5 degrees Celsius.

All records shall be retained for at least two years following the date of the measurements.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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

Condition 42: Compliance Certification

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 60.445(g), NSPS Subpart RR

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If an affected facility that is controlled by a solvent destruction device uses a hood or enclosure system to capture fugitive VOC emissions, a monitoring device shall be installed, calibrated, maintained, and operated to continuously indicate that the hood or enclosure system is

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



operating.

No continuous monitor is required if it is demonstrated that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system.

All records shall be retained for at least two years following the date of the measurements.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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

**Condition 43: Test methods for determination of coating VOC content
Effective between the dates of 06/26/2006 and 06/25/2011**

Applicable Federal Requirement: 40CFR 60.446(a), NSPS Subpart RR

Item 43.1:

This Condition applies to Emission Unit: U-00001

Item 43.2:

The VOC content of coating solids as applied and compliance with 40 CFR 60.442(a)(1) shall be determined by either reference Method 24 and the equations specified in 40 CFR 60.443 or by manufacturer's formulation data. In the event of an inconsistency between the Method 24 test and the manufacturer's formulation data, the Method 24 test will govern.

A source owner or operator may be required to perform Method 24 tests during such months as deemed appropriate. The coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.

**Condition 44: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011**

Applicable Federal Requirement: 40CFR 64

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



Monitoring Description:

The following is the Compliance Assurance Monitoring (CAM) Plan for the Thermal oxidizers controlling VOC and HAPs emissions from Coating Line 4 (EP 00002) and Coating Line 5 (EP 00001).

INDICATOR 1: OXIDIZER OPERATING TEMPERATURE

I. MEASUREMENT APPROACH:

Continuously record the operating temperature of the oxidizers' combustion zone.

II. INDICATOR RANGE: < 50 F

An excursion is identified as a reading of 50 degrees F less than the average temperature demonstrated during the most recent compliance demonstration. This excursion may not exceed any rolling three-hour period during the monitoring and reporting period.

CORRECTIVE ACTION: Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.

III. PERFORMANCE CRITERIA

A. DATA REPRESENTATIVENESS: Any temperature monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 0.75% of temperature measured.

B. VERIFICATION OF OPERATIONAL STATUS: Temperature recorded on chart paper or electronic media.

C. QA/QA PRACTICES and CRITERIA: Validation of temperature system calibrations performed annually. Acceptable criteria +20 degrees F. (See footnote No.1)

D. MONITORING:

FREQUENCY - Continuously

DATA COLLECTION PROCEDURE - Recorded at least every 15-minutes on a chart or electronic media.

AVERAGING PERIOD - Three-hour rolling average.

E. RECORDKEEPING:

Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



F. REPORTING:

Number, duration cause of any excursion and the corrective action taken with a report submitted within 30 days of the excursion.

G. FREQUENCY:

Within 30-days of excursion and semiannual summary.

INDICATOR 2: WORK PRACTICE/INSPECTION

I. MEASUREMENT APPROACH:

Inspect internal and external structural integrity of oxidizer to ensure proper operation. (See Footnotes No. 2, 3)

II. INDICATOR RANGE:

An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates in accordance with manufacturer specification.

CORRECTIVE ACTION: Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.

III. PERFORMANCE CRITERIA

A. DATA REPRESENTATIVENESS:

Inspection of the oxidizer system to identify any problem.

B. VERIFICATION OF OPERATIONAL STATUS: - Inspection reports by a qualified technician.

C. QA/QA PRACTICES and CRITERIA:

Internal inspection shall only be performed by a qualified technician.

D. MONITORING:

FREQUENCY - External inspection quarterly and internal inspection annually (see footnotes 2, 3)

DATA COLLECTION PROCEDURE - Written documentation of inspection results and observations.

AVERAGING PERIOD - Not applicable.

E. RECORDKEEPING:

Maintain for a period of 5 years records of inspections and corrective actions taken in response to

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



excursions.

F. REPORTING:

Number, duration cause of any excursion and the corrective action taken with a report submitted within 30 days of the excursion.

G. FREQUENCY:

Within 30-days of excursion and semiannual summary.

INDICATOR 3: PERFORMANCE TEST

I. MEASUREMENT APPROACH:

Conduct source emission testing to demonstrate compliance with the permitted destruction efficiencies.

II. INDICATOR RANGE:

An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.

CORRECTIVE ACTION: Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.

III. PERFORMANCE CRITERIA

A. DATA REPRESENTATIVENESS:

A test protocol shall be prepared and approved by the Regulatory Agency prior to conducting the performance test.

B. VERIFICATION OF OPERATIONAL STATUS: - Emission

testing must be conducted in accordance with the test protocol and witnessed by the Regulatory Agency representative. A final test report must be submitted with the permitted time period.

C. QA/QA PRACTICES and CRITERIA:

EPA approved test method must be used to conduct emission testing.

D. MONITORING:

FREQUENCY - Once in every 5 years.

DATA COLLECTION PROCEDURE - Emission testing must be conducted in accordance with the test protocol and witnessed by the Regulatory Agency representative. A final test report must be submitted with the permitted



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

time period

AVERAGING PERIOD - In accordance with the approved test protocol.

E. RECORDKEEPING:

Maintain for a period of 5 years records of inspections or until the next test is conducted. Maintain records of corrective actions taken in response to excursions.

F. REPORTING:

Submit test protocol and notification of testing within 30 days prior to test date. Submit test report 60 days after conducting a performance test.

G. FREQUENCY:

For each performance test conducted.

Footnotes:

1. Facility to maintain Standard Operating Procedure on-site for verifying accuracy of system.
2. Internal inspection of regenerative unit (CL5 EP00001) should include annual assessment of valves for leakage; this assessment may be comprised of an internal inspection, or other method of assessment for leakage.
3. Internal inspection (by a qualified technician) of recuperative unit (CL4 EP00002) should include annual assessment of heat exchanger for leakage; this assessment may be comprised of an internal inspection, or other method of assessment for leakage.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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

Condition 45: Compliance Certification

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 64

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following is the Compliance Assurance Monitoring (CAM) Plan for the Material Usage and VOC/HAP

Emissions:

a. Measurement Approach

Adchem operates two solvent Coating Lines No. 4 and No. 5.

To demonstrate compliance with the 12-month rolling total limit of 100 tons VOC per year, the facility shall follow the recordkeeping procedures described below. The same procedure shall also be used to track HAPs emissions.

VOC Content of Material Applied: Adchem will use the values from the most recent material safety data sheet (MSDS) obtained from the supplier. Information from these data sheets is kept in Adchem's office.

Quantity of Material Applied for the Month: Adchem will calculate the quantity of each material used for the month by summing the amount of the material used during the month, based on operating records. The operating records are maintained in the facility's computing system. Usage is expressed in terms of pounds.

b. Measurement Frequency

Material Composition: Adchem and its suppliers shall provide a MSDS each time it purchases a new product or there is a change in the formulation of the material. New MSDSs shall replace any outdated versions immediately upon receipt.

Material Usage: Coating usage is entered into the Adchem system within five working days after is used.

c. Calculations

Material Composition: Values supplied on MSDSs

Material Usage: For each material, all usage during the month is summed to approximate total usage for the month. Usage is in terms of pounds of material, so no conversions are required.

d. Recordkeeping



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Adchem will maintain hard copies of each current MSDS in its files. New and replacement MSDS are transmitted to Adchem by suppliers upon delivery and routed to the Adchem official. The facility official enters each pertinent MSDS value into Adchem material compliance spreadsheet prior to performing the compliance calculations at the end of the month. The MSDSs are filed after being entered into the compliance spreadsheet.

Usage records are entered at the time of the material application or use. These records typically are entered into the computer within five working days after production.

After the last day of each month, Adchem will perform the compliance calculation to demonstrate the rolling 12-month VOC total of less than 100 tons for that month. A similar calculation is made for HAPs to demonstrate that emission less than 10 tons per year. Capture and destruction efficiencies will be based upon the most recent stack test results. Records of each monthly calculation are kept on file.

For semiannual reports, the spreadsheet data for each month will be used to prepare the appropriate summary tables. Adchem will prepare the appropriate text for the report, and a responsible official will sign and submit the report to the Department. The reports will be maintained as electronic computer files and in hard copy.

e. **QA/QC Procedures**

All computer data and records will be backed up weekly.

Every six months, Adchem will review usage records (i.e., the records up loaded into the compliance spreadsheet) against summary records received from the material suppliers. If these records fail to agree within 10 percent, Adchem will evaluate the probable sources of error and, if necessary, revise the plan to correct any shortcomings.

Every year, Adchem will perform a comprehensive review of the QA/QC program, including spot-checking the material composition values in the spreadsheet against MSDS hard copies and reviewing spreadsheet macros and equation to



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

verify that they are correct. For any errors that are identified, the past year's compliance calculations will be redone, and the results reported to the permitting authority. The corrected calculations will replace the erroneous ones. If any errors are identified, the plan will be revised to minimize their recurrence.

Records of all QA/QC activities, audits, and reviews will be maintained in the files.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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

Condition 46: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 64

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following is the Compliance Assurance Monitoring (CAM) Plan for Coating Lines 4 and 5 where the exhaust gas can be diverted away from the air pollution control device to atmosphere. This is also applicable to the BYPASS damper installed at the air pollution control device, proper; i.e., an emergency bypass.

A. Rationale for Selection of Monitoring Approach
The CAM rule 40CFR 64.3 (a)(2)) requires that "unless stated otherwise, by an applicable requirement, the owner or operator shall monitor indicators to detect bypass of the control device (or capture system) to the atmosphere, if such bypass of the control device can occur based on the design of the pollutant-specific emissions unit." The coating lines employ a damper that directs process line exhaust to the control device or to the atmosphere

New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001



(bypass). These “bypass” dampers need to be monitored to verify that the exhaust gases are being sent to the control device when the process is in operation.

B. Monitoring Approach

Each bypass damper located in the exhaust gas capture system between Coating Lines 4 and 5 and the thermal incinerator shall be monitored as follows:

- i. Ensure that any bypass line valve or damper is in the closed position through continuous monitoring of valve position using Limit Switches. The monitoring system shall be inspected at least once every month to ensure that it is functioning properly.
- ii. Each bypass damper or valve is inspected at least annually to ensure proper operation of the valve or damper.

C. Operational Description of Bypass Interlock

i. Start up of a coating line:

1. The oxidizer is brought up to the set point temperature
2. The dryer blowers and burners are turned on
3. The PLC-controlled bypass damper automatically diverts air flow to the oxidizer only after the oxidizer reaches temperature. Only then the PLC shall allow the Coating Line to start.

ii. Normal shut down:

1. Shut down Coating Line
2. Shut down dryer
3. Shut down oxidizer

iii. Emergency shut down

The PLC shall automatically shut down the Coating Line if either a) the oxidizer temperature falls below the required temperature, or b) the blowers or burners in the oven shut down. For safety reasons, the bypass damper will also open.

The operator will be allowed to run water based coatings on Lines 4 and 5 if the “Aqueous” option is selected at start up. The bypass damper remains open during water based runs. To prevent operator error on the position of the bypass damper, the PLC shall automatically shut the line down if the Lower Explosive Limit (LEL) monitor detects that solvent based coating is being applied (see Footnotes below).

D. Indicator Range and Excursion



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

The limit switches tied into the coating line will prevent any excursion.

Footnotes:

1. Coating Line No. 5 is connected to the PLC to automatically shut down if the LEL monitor detects that solvent based coating is being applied. Coating Line No. 4 shall be connected to the PLC for similar automatic shut down by no later than March 15, 2006.
2. The PLC shall be equipped with a data logger to record the use of bypass to include time, duration and cause of such use.
3. The LEL monitor shall be calibrated in accordance with the manufacturer's recommendations with the appropriate calibration gas. This calibration check records shall be maintain on-site for department representative's review when requested.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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

Condition 47: Compliance Certification

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 228.5(g)(1)

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 101 Emission Source: 000I2

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

Item 47.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Temperature of thermal oxidizer will be monitored as indication of destruction efficiency. Continuous



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

temperature measurement and recording to demonstrate an average temperature of not less than 1563 deg. F (or as demonstrated by the most recent stack test) during any 3-hr period.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1563 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR ROLLING AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 48: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 60.443(e), NSPS Subpart RR

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 101 Emission Source: 000I2

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

Item 48.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The owner/operator shall continuously record the thermal incinerator temperature during coating operations. All 3-hours periods during which the average temperature of the incinerator is more than 28 degrees Celsius (50 F) below the average temperature of the incinerator during the most recent performance test shall be recorded.

The initial performance test shall be conducted according to the procedures listed in 40CFR60.444(c).

A monitoring device shall be installed, calibrated, maintained, and operated which continuously indicates and records the temperature of the thermal incinerator's



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

exhaust gases. This monitoring device shall have an accuracy of the greater of +/- 0.75% of the temperature being measured in degrees Celsius or +/- 2.5 degrees Celsius.

The performance test data and results from the performance test shall be submitted as specified in 40CFR60.8(a).

Following the performance test, the owner or operator shall submit quarterly reports of exceedances of the VOC emission limits. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

Reports shall also be submitted at the frequency specified in 40CFR60.7(c) when the incinerator temperature drops as defined above. If no such periods occur, this shall be stated in the report.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1563 degrees Fahrenheit
Reference Test Method: 25 or 25A as appropriate
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR ROLLING AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 49: Compliance Certification
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 40CFR 60.443(e), NSPS Subpart RR

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00002
Process: 101 Emission Source: 000I2

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

Item 49.2:

Compliance Certification shall include the following monitoring:



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

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

Monitoring Description:

The owner/operator shall continuously record the thermal incinerator temperature during coating operations. All 3-hours periods during which the average temperature of the incinerator is more than 28 degrees Celsius (50 F) below the average temperature of the incinerator during the most recent performance test shall be recorded.

The initial performance test shall be conducted according to the procedures listed in 40CFR60.444(c).

A monitoring device shall be installed, calibrated, maintained, and operated which continuously indicates and records the temperature of the thermal incinerator's exhaust gases. This monitoring device shall have an accuracy of the greater of +/- 0.75% of the temperature being measured in degrees Celsius or +/- 2.5 degrees Celsius.

The performance test data and results from the performance test shall be submitted as specified in 40CFR60.8(a).

Following the performance test, the owner or operator shall submit quarterly reports of exceedances of the VOC emission limits. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

Reports shall also be submitted at the frequency specified in 40CFR60.7(c) when the incinerator temperature drops as defined above. If no such periods occur, this shall be stated in the report.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1234 degrees Fahrenheit

Reference Test Method: 25 or 25A as appropriate

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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

Condition 50: Compliance Certification



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable Federal Requirement: 6NYCRR 228.5(g)(1)

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00002
Process: 101 Emission Source: 000I3

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

Item 50.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Temperature of thermal oxidizer will be monitored as indication of destruction efficiency. Continuous temperature measurement and recording to demonstrate an average temperature of not less than 1234 deg. F (or as demonstrated by the most recent stack test) during any 3-hr period.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1234 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR ROLLING AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2006.
Subsequent reports are due every 6 calendar month(s).



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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 51: Contaminant List
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable State Requirement: ECL 19-0301

Item 51.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY998-00-0

Name: VOC

Condition 52: Unavoidable noncompliance and violations
Effective between the dates of 06/26/2006 and 06/25/2011

Applicable State Requirement: 6NYCRR 201-1.4

Item 52.1:

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



New York State Department of Environmental Conservation

Permit ID: 1-4730-00001/00011

Facility DEC ID: 1473000001

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 53: Air pollution prohibited

Effective between the dates of 06/26/2006 and 06/25/2011

Applicable State Requirement: 6NYCRR 211.2

Item 53.1:

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.