



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 3-3924-00173/00010
Effective Date: 01/12/2016 Expiration Date: 01/11/2021

Permit Issued To: AVERY DENNISON OFFICE PRODUCTS COMPANY
524 ST RTE 303
ORANGEBURG, NY 10962

Contact: KEITH FERRY
524 ST RTE 303
ORANGEBURG, NY 10962
(845) 359-4100

Facility: AVERY DENNISON RIS, LLC.
524 ST RTE 303
ORANGEBURG, NY 10962

Contact: KEITH FERRY
524 ST RTE 303
ORANGEBURG, NY 10962
(845) 359-4100

Description:
Facility (formerly PaxarCorporation) is an urethane-based fabric coating plant involving the formulation and application of surface coatings. It consists of three coating lines each containing several emission sources such as ovens and coating stations. Additional equipment includes reactors, mixing units, storage vessels, and a thermal oxidizer for controlling emissions. The facility is a major source for VOCs and hazardous air pollutants (HAPS) and is required to meet MACT standards for Fabric Printing, Coating & Dyeing sources as regulated by 40 C.F.R. Part 63 subpart OOOO.

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: GEORGE A SWEIKERT
NYSDEC - REGION 3
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561-1696

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS



DEC GENERAL CONDITIONS

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

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.3:

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

Condition 4: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:



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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 3 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054

New York State Department of Environmental Conservation

Permit ID: 3-3924-00173/00010

Facility DEC ID: 3392400173



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: AVERY DENNISON OFFICE PRODUCTS COMPANY
524 ST RTE 303
ORANGEBURG, NY 10962

Facility: AVERY DENNISON RIS, LLC.
524 ST RTE 303
ORANGEBURG, NY 10962

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

Permit Effective Date: 01/12/2016

Permit Expiration Date: 01/11/2021



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
 - 2 6 NYCRR 201-6.4 (a) (7): Fees
 - 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
 - 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
 - 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
 - 6 6 NYCRR 201-6.4 (e): Compliance Certification
 - 7 6 NYCRR 202-2.1: Compliance Certification
 - 8 6 NYCRR 202-2.5: Recordkeeping requirements
 - 9 6 NYCRR 215.2: Open Fires - Prohibitions
 - 10 6 NYCRR 200.7: Maintenance of Equipment
 - 11 6 NYCRR 201-1.7: Recycling and Salvage
 - 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
 - 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
 - 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
 - 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
 - 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
 - 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
 - 18 6 NYCRR 202-1.1: Required Emissions Tests
 - 19 40 CFR Part 68: Accidental release provisions.
 - 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
 - 21 6 NYCRR Subpart 201-6: Emission Unit Definition
 - 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
 - 23 6 NYCRR 202-2.3: Required contents of an emission statement.
 - 24 6 NYCRR 202-2.4: Emission statement methods and procedures
 - 25 6 NYCRR 211.1: Air pollution prohibited
 - 26 6 NYCRR 212.4 (c): Compliance Certification
 - 27 6 NYCRR 228-1.1 (a) (3): Once in always in
 - 28 6 NYCRR 228-1.3 (a): Compliance Certification
 - 29 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
 - 30 6 NYCRR 228-1.3 (d): Compliance Certification
 - 31 6 NYCRR 228-1.6 (d): Compliance Certification
 - 32 40CFR 63.4291(a), Subpart OOOO: Compliance Certification
 - 33 40CFR 63.4291(a), Subpart OOOO: Compliance Certification
 - 34 40CFR 63.4311(a), Subpart OOOO: Compliance Certification
 - 35 40CFR 63.4312, Subpart OOOO: Compliance Certification
 - 36 40CFR 63.4313, Subpart OOOO: Compliance Certification
- #### Emission Unit Level
- 37 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
 - 38 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=1-00000

- 39 6 NYCRR 228-1.3 (b) (1): Compliance Certification
- 45 6 NYCRR 228-1.5 (c): Compliance Certification

New York State Department of Environmental Conservation

Permit ID: 3-3924-00173/00010

Facility DEC ID: 3392400173



- 40 6 NYCRR 228-1.6 (e): VOC content of gas stream test methods
- 41 6 NYCRR 228-1.6 (f) (1): Compliance Certification

EU=1-00000

- 42 40CFR 63.4290, Subpart OOOO: Compliance Certification
- 43 40CFR 63.4292(b), Subpart OOOO: Compliance Certification
- 44 40CFR 63.4293(b), Subpart OOOO: Compliance Certification

EU=2-00000

- 46 6 NYCRR 228-1.4 (d) (2): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 47 ECL 19-0301: Contaminant List
- 48 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 49 6 NYCRR 211.2: Visible Emissions Limited



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 - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

- i. 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 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 01/12/2016 and 01/11/2021

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

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

Condition 2: Fees
Effective between the dates of 01/12/2016 and 01/11/2021

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

Item 2.1:

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

Condition 3: Recordkeeping and Reporting of Compliance Monitoring
Effective between the dates of 01/12/2016 and 01/11/2021

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



Item 3.1:

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

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

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

**Condition 4: Records of Monitoring, Sampling, and Measurement
Effective between the dates of 01/12/2016 and 01/11/2021**

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

Item 4.1:

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

**Condition 5: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021**

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



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

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

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill



Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

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

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



Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2016.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related record keeping 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.

New York State Department of Environmental Conservation

Permit ID: 3-3924-00173/00010

Facility DEC ID: 3392400173



The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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

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

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
NYSDEC Region 3 Suboffice
100 Hillside Avenue, #1W
White Plains, NY 10603

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 1/30/2017.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

New York State Department of Environmental Conservation

Permit ID: 3-3924-00173/00010

Facility DEC ID: 3392400173



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. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

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 01/12/2016 and 01/11/2021**

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

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

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

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

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

**Condition 9: Open Fires - Prohibitions
Effective between the dates of 01/12/2016 and 01/11/2021**

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

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

Item 9.2

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

(a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.

(b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.



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

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

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

**Condition 10: Maintenance of Equipment
Effective between the dates of 01/12/2016 and 01/11/2021**

Applicable Federal Requirement: 6 NYCRR 200.7

Item 10.1:

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



procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

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

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 01/12/2016 and 01/11/2021

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

Item 13.1:

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

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 01/12/2016 and 01/11/2021

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

Item 14.1:

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

Condition 15: Requirement to Provide Information
Effective between the dates of 01/12/2016 and 01/11/2021

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



Item 20.1:

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

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

Condition 21: Emission Unit Definition
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 21.1:

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

Emission Unit: 1-00000

Emission Unit Description:

Solvent and water-based coating formulation and solvent-based coating application. The unit consists of three processes (p02, p03, and p04), eighteen sources (00107-00109, 00111-00116, 00118-00127), two control devices (00101, 00117) , and one emission point (0001A).

Building(s): MAIN

Item 21.2:

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

Emission Unit: 2-00000

Emission Unit Description:

Water-based coating application and compliant coating application. Includes E line with coating stations and ovens. The unit consists of one process (p06), four emission sources (00201-00204), and five emission points (00005-00009).

Building(s): MAIN

Item 21.3:

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

Emission Unit: 3-00000

Emission Unit Description:

Unit consists of raw material storage. Unit includes 3 underground storage tanks (one tank is exempt).

Building(s): MAIN

Condition 22: Progress Reports Due Semiannually
Effective between the dates of 01/12/2016 and 01/11/2021



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

Item 22.1:

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

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

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

**Condition 23: Required contents of an emission statement.
Effective between the dates of 01/12/2016 and 01/11/2021**

Applicable Federal Requirement:6 NYCRR 202-2.3

Item 23.1:

(a) Emission statements shall include the following:

(1) Certification by a duly authorized representative. A duly authorized representative must sign a form provided by the Department to verify the truth, accuracy, and completeness of the emission statement. This certification shall state that, based on information and belief formed after reasonable inquiry by the duly authorized representative, the statements and information in the document are true, accurate, and complete. The certification shall include the full name, title, original signature, date of signature and telephone number of the duly authorized representative.

(2) Facility level information, consisting of:

- (i) verification of full name of facility;
- (ii) verification of parent company name;
- (iii) verification of street address (physical location) of the facility;
- (iv) verification of four digit SIC code(s) for the facility;
- (v) calendar year reportable emissions.
- (vi) total facility fuel use and fuel sulfur content and heat value (for combustion installations); and,
- (vii) fugitive emissions.

(3) Emission point level information, consisting of:

- (i) average hours of operation per day (peak ozone and carbon monoxide seasons);
- (ii) average days of operation per week (peak ozone and carbon monoxide seasons);



- (iii) weeks of operation per year (seasonal and annual);
 - (iv) hours of operation per year; and
 - (v) percentage annual throughput (percentage of annual activity by season).
 - (vi) verification of latitude and longitude.
- (4) Process level information, consisting of:
- (i) maximum heat input (for combustion installations);
 - (ii) quantity of fuels consumed (for combustion installations);
 - (iii) estimated actual annual reportable emissions, for each air regulated air pollutant emitted, (in units of pounds per year);
 - (iv) estimated emissions method (see 6 NYCRR Part 202-2.4(b));
 - (v) emission factor(s) (if used to determine actual emissions);
 - (vi) primary and secondary control equipment identification code(s);
 - (vii) control efficiencies achieved by the control equipment. The control efficiency should reflect the total control efficiency from all control equipment for a specific criteria group (e.g., VOCs and NO_x). If the actual control efficiency is unavailable, the design efficiency or the control efficiency limit imposed by a permit shall be used;
 - (viii) annual process rate;
 - (ix) peak ozone season daily process rate.
- (b) Petroleum, volatile organic liquid, and fuel storage and distribution facilities must provide the following additional information:
- (1) tank capacity (including maximum and average liquid height, and working volume); and
 - (2) throughput associated with tanks and loading racks (including turnovers per year).
- (c) The Department shall provide instructions concerning the emission statements applicable to a particular facility, when the statement is mailed to the facility. These instructions shall include control equipment identification code(s) and estimated emissions method code(s).

Condition 24: Emission statement methods and procedures
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement: 6 NYCRR 202-2.4

Item 24.1:

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



(a) Emissions estimates shall be based on the owner's or operator's use of the following methods. For each instance, the owner or operator must utilize one of the following emissions estimation methods to represent actual emissions emitted during the calendar year.

- (1) stack samples or other emission measurements;
- (2) material balance using knowledge of the process;
- (3) national emission factors;
- (4) best engineering judgement (including manufacturers' guarantees);
- (5) state or local agency emission factors approved by EPA;

(6) standard EPA emission factors (SCC emission factor). The Department shall assign the SCC to a particular facility. A source owner may request the Department to change an assigned SCC;

- (7) other published emission factors (please provide); and
- (8) other (please specify).

(NOTE: Emissions testing is generally not required for determining emissions to comply with this regulation. When monitoring or testing data is available and has been validated and verified by the Department and is still applicable to the operations during the reporting period, this monitoring or testing data should be used to calculate emissions for this reporting requirement. In the absence of validated monitoring or testing data, the facility should use the emissions estimation method which would yield accurate emissions data.)

(b) If a source owner or operator is required to use a specific monitoring method to demonstrate compliance with other applicable requirements, the Department may require that the emission estimates for the corresponding processes be based on information obtained from that monitoring method. The Department may reject the use of a proposed method for a particular process if it can be demonstrated that the method does not represent actual emissions.

(c) Any owner or operator of a reportable facility shall transmit the emission statement to the Department on forms acceptable to the Department. With the prior approval of the Department, an emission statement which meets the requirements of section 202-2.4 may be submitted on computer diskette or transmitted electronically in lieu of a written submission.

(d) The owner or operator may request that information submitted in emission statements be designated as a trade secret, in accordance with Part 616 of this Title. Data elements not considered to be confidential include: emissions, estimated emissions method, and the SCC. The Department will evaluate claims for confidentiality in accordance with Part 616 of this Title.

Condition 25: Air pollution prohibited
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:6 NYCRR 211.1

Item 25.1:



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

Condition 26: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Item 26.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

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

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



normal operating mode.

In addition to the above opacity evaluation, the permittee will conduct daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Inclement weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry.

If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air



the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 29: Surface Coating- Prohibitions
Effective between the dates of 01/12/2016 and 01/11/2021

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

Item 29.1:

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

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

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

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

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

Condition 30: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

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

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this



Subpart must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) clean hand held spray guns by one of the following:
 - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary



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 7/30/2016.

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

Condition 31: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement: 6 NYCRR 228-1.6 (d)

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Item 31.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

When an owner and/or operator of a coating line utilizes control equipment to comply with permit requirements or regulations, test methods acceptable to the department must be used to determine the overall removal efficiency during a required performance test.

(1) The overall removal efficiency may be determined by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control equipment.

(2) For any 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. The approved VOC CE test methods are contained in Part 228-1.6(d)(2) Table 'Approved VOC CE Test Methods'. Test methods 204 through 204F (M204 - M204F) are included in Appendix M of 40 CFR part 51 (see table 1, Section 200.9 of Title III). When the sampling and analysis methods described in this paragraph are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department and the administrator.

(3) Alternative CE protocols and test methods may be allowed if the data quality objective approach or lower confidence limit approach requirements are met in conjunction with the additional criteria set forth in the EPA guidance document entitled Guidelines for Determining Capture Efficiency (see table 1, Section 200.9 of Title III). The alternative CE protocols and test methods must



be approved in advance by the department. Also, the multiple line testing procedures outlined in the above guidance document can be used to determine CE if the applicable criteria are satisfied. The multiple line testing CE protocols and test methods must be approved in advance by the department.

Parameter Monitored: DEGREE OF AIR CLEANING

Upper Permit Limit: 90 percent

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 32: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:40CFR 63.4291(a), Subpart OOOO

Item 32.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 2-00000

Process: P06

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must include all regulated materials (as defined in §63.4371) used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.4290.

To make this determination, the facility must use one of the options listed in §63.4291(a)(1)-(5) for web coating and printing operations.

One option is for the facility to demonstrate that the organic HAP content, as purchased, of each coating and printing material applied in the web coating/printing operation(s) is less than or equal to the applicable emission limit in Table 1 of subpart OOOO, and that each thinning and cleaning material is purchased contains no organic HAP (as defined in §63.4371). The facility must meet all the requirements of §63.4320, 63.4321, and 63.4322 to demonstrate compliance with the applicable emission limit using this option.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



Reports due 30 days after the reporting period.
The initial report is due 7/30/2016.
Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:40CFR 63.4291(a), Subpart OOOO

Item 33.1:

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

Emission Unit: 1-00000
Process: P02

Emission Unit: 1-00000
Process: P03

Emission Unit: 1-00000
Process: P04

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must include all regulated materials (as defined in §63.4371) used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.4290.

To make this determination, the facility must use one of the options listed in §63.4291(a)(1)-(5) for web coating and printing operations.

One option is for the facility to demonstrate that, based on the organic HAP emission capture and add-on control efficiencies achieved, the organic HAP overall control efficiency is greater than or equal to the applicable organic HAP overall control efficiency limit in table 1 of subpart OOOO. If the facility uses this option, the facility must also demonstrate that all capture systems and control devices for the web coating/printing operating(s) meet the operating limits required in §63.4292, except for solvent recovery systems for which the facility conducts liquid-liquid material balances according to §63.4351(d)(5), and that the facility meets the work practice standards required in §63.4293. The facility must meet all the requirements of §63.4350-4352

New York State Department of Environmental Conservation

Permit ID: 3-3924-00173/00010

Facility DEC ID: 3392400173



and 63.4360-4364 to demonstrate compliance with the applicable emission limits, operating, limits, and work practice standards using this option.

Averaging Method: 12-month rolling average
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2016.
Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:40CFR 63.4311(a), Subpart OOOO

Item 34.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The facility must submit semiannual compliance reports for each affected source according to the requirements in §63.4311(a)(3)-(8) by the dates specified in §63.4311(a)(1). The semiannual compliance reporting requirements of this condition may be satisfied by reports required under the Title V program, as specified in §63.4311(a)(2).

Reference Test Method: US EPA APPROVED METHOD
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 7/30/2016.
Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:40CFR 63.4312, Subpart OOOO

Item 35.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP



Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must collect and keep a record of the following data and information:

- 1) A copy of each notification and report that was submitted to comply with this subpart, and the documentation supporting each notification and report.
- 2) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data or test data used to determine the mass fraction of organic HAP for coating, printing, slashing, dyeing, finishing, thinning, and cleaning materials; and the mass fraction of solids for coating and printing materials. If the facility conducted testing to determine mass fraction of organic HAP of coating materials or the mass fraction of solids of coating materials, the facility must keep a copy of the complete test report. If the facility uses information provided to the facility by the manufacturer or supplier of the material that was based on testing, the facility must keep the summary sheet of results provided to the facility by the manufacturer or supplier. The facility is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
- 3) For each compliance period, the records specified in §63.4312(c)(1) for web coating/printing operations and §63.4312(c)(2) for dyeing/finishing operations.
- 4) A record of the name and mass of each regulated material applied in the web coating and printing subcategory and the dyeing and finishing subcategory during each compliance period. If the facility is using the compliant material option for all regulated materials at the source, the facility may maintain purchase records for each material used rather than a record of the mass used.
- 5) A record of the mass fraction of organic HAP for each regulated material applied during each compliance period.
- 6) A record of the mass fraction of coating and printing solids for each coating and printing material applied during each compliance period.



7) The information listed in §63.4312(g)(1)-(3) if the facility uses an allowance in equation 1 or 4 of §63.4331 for organic HAP contained in waste materials sent to, or designated for shipment to, a TSDF.

8) The information listed in §63.4312(h)(1) and (2) if the facility uses an allowance in equation 4 for organic HAP contained in wastewater discharged to a POTW or treated onsite prior to discharge.

9) Records of the date, time, and duration of each deviation.

10) The information listed in §63.4312(j)(1)-(8) if the facility uses the emission rate with add-on control option, the organic HAP overall control efficiency option, or the oxidizer outlet organic HAP concentration option.

Reference Test Method: US EPA APPROVED METHOD

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 7/30/2016.

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

Condition 36: Compliance Certification

Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:40CFR 63.4313, Subpart OOOO

Item 36.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility's records must be kept in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

As specified in §63.10(b)(1), the facility must keep each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action,



report, or record.

The facility must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The facility may keep records off site for the remaining 3 years.

Reference Test Method: US EPA APPROVED METHOD
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 7/30/2016.
Subsequent reports are due every 6 calendar month(s).

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

**Condition 37: Emission Point Definition By Emission Unit
Effective between the dates of 01/12/2016 and 01/11/2021**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 37.1:

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

Emission Unit: 1-00000

Emission Point: 0001A

Height (ft.): 34 Diameter (in.): 42
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Item 37.2:

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

Emission Unit: 2-00000

Emission Point: 00005

Height (ft.): 26 Length (in.): 22 Width (in.): 22
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Emission Point: 00006

Height (ft.): 26 Length (in.): 22 Width (in.): 22
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Emission Point: 00007

Height (ft.): 26 Length (in.): 22 Width (in.): 22
NYTMN (km.): 4545.223 NYTME (km.): 588.533 Building: MAIN

Emission Point: 00008



Emission Source/Control: 00101 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00111 - Process

Emission Source/Control: 00112 - Process

Emission Source/Control: 00113 - Process

Emission Source/Control: 00114 - Process

Emission Source/Control: 00115 - Process

Emission Source/Control: 00116 - Process

Item 38.3:

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

Emission Unit: 1-00000

Process: P04

Source Classification Code: 4-02-042-21

Process Description:

The process consists of five mixing vessels and two coating storage tanks used in the formulation of the coatings. The emissions from the vessels are sent to a baghouse for particulate control and then to the thermal oxidizer.

Emission Source/Control: 00101 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00117 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00118 - Process

Emission Source/Control: 00119 - Process

Emission Source/Control: 00120 - Process

Emission Source/Control: 00124 - Process
Design Capacity: 2,500 pounds

Emission Source/Control: 00125 - Process
Design Capacity: 2,500 pounds

Emission Source/Control: 00126 - Process
Design Capacity: 800 gallons

Emission Source/Control: 00127 - Process
Design Capacity: 800 gallons



Item 38.4:

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

Emission Unit: 2-00000
Process: P06 Source Classification Code: 4-02-008-03
Process Description:
Process consists of the e-line coating process. The process utilizes water based coatings and compliant coatings.

Emission Source/Control: 00201 - Process
Emission Source/Control: 00202 - Process
Emission Source/Control: 00203 - Process
Emission Source/Control: 00204 - Process

Item 38.5:

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

Emission Unit: 3-00000
Process: P09 Source Classification Code: 4-02-999-95
Process Description:
Process consists of 3 underground tanks used for the storage of coating reactants (one tank is exempt).

Emission Source/Control: 00308 - Control
Control Type: VAPOR RECOVERY SYS(INCL.
CONDENSERS,HOODING, OTHER ENCLOSURES)

Emission Source/Control: 00311 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 00303 - Process
Design Capacity: 10,000 gallons

Emission Source/Control: 00310 - Process
Design Capacity: 10,000 gallons

Condition 39: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021
Applicable Federal Requirement:6 NYCRR 228-1.3 (b) (1)

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-00000



Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 45: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement: 6 NYCRR 228-1.5 (c)

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-00000

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The overall removal efficiency of an air cleaning device used as a control strategy must be determined, for every surface coating formulation, on a solids as applied basis using Equation 2 unless a 90 percent or greater overall removal efficiency is achieved by the air cleaning device as determined by Equation 2 presented under an Optional Condition.

As per 6 NYCRR 228-1.3(b)(1), a facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 90 percent. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department. All records required by this condition must be maintained at the facility for a period of five years.

Parameter Monitored: VOC

Lower Permit Limit: 90 percent degree of air cleaning or greater

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 40: VOC content of gas stream test methods
Effective between the dates of 01/12/2016 and 01/11/2021**

Applicable Federal Requirement: 6 NYCRR 228-1.6 (e)

Item 40.1:

This Condition applies to Emission Unit: 1-00000

Item 40.2:

The owner and/or operator of a surface coating line must follow the applicable notification requirements, protocol requirements, and test procedures of 6 NYCRR Part 202 for testing and monitoring. Depending on the conditions at the test site, one of the following methods from Appendix A of 40 CFR Part 60 (see Table 1 of 6 NYCRR Part 200.9) must be used when measuring the VOC content of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

(1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;

(2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or

(3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

New York State Department of Environmental Conservation

Permit ID: 3-3924-00173/00010

Facility DEC ID: 3392400173



When the sampling and analysis methods required by this condition are not applicable, alternate sampling and analysis methods can be used, subject to the approval of the department.

Condition 41: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:6 NYCRR 228-1.6 (f) (1)

Item 41.1:

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

Emission Unit: 1-00000

Emission Unit: 5-00000

Item 41.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

If an incinerator is used as an air cleaning device, a continuous monitor for exhaust gas temperature must be installed, periodically calibrated, and operated when the control equipment is operating. When temperatures fall below the approved performance test combustion temperature; immediate action must be taken to restore control equipment to its proper operating temperature.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees F below the approved
performance test combustion
temperature

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/10/2016 for the period 01/12/2016 through 07/11/2016

Condition 42: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:40CFR 63.4290, Subpart OOOO

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-00000

Regulated Contaminant(s):



CAS No: 0NY100-00-0 TOTAL HAP

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility operates an existing coating and printing affected source then the facility must reduce organic HAP emissions to the atmosphere by achieving at least a 97% organic HAP overall control efficiency.

The facility shall meet the requirements in §63.4291(a)(4) in order to demonstrate compliance with this emission reduction limit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2016.

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

Condition 43: Compliance Certification

Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement:40CFR 63.4292(b), Subpart OOOO

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-00000

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 43.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

If the facility uses a thermal oxidizer in order to comply with the emission rate with add-on controls option, the organic HAP overall removal efficiency option, or the outlet organic HAP concentration option, then the facility must not allow the average temperature in any 3-hour block period to fall below the temperature limit established during the performance test according to §63.4363(a).

Compliance will be continuously determined by:

i) Collecting the temperature data according to the provisions in §63.4364(c)



- ii) Reducing the data to 3-hour block averages; and
- iii) Maintaining the 3-hour block average temperature at or above the temperature limit.

Parameter Monitored: TEMPERATURE
Upper Permit Limit: 1502 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2016.
Subsequent reports are due every 6 calendar month(s).

Condition 44: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement: 40CFR 63.4293(b), Subpart OOOO

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-00000

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The facility must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of regulated materials used in, and waste materials generated by, the coating/printing or dyeing/finishing operations for which the facility uses this option; or the facility must meet an alternative standard as provided in §63.4293(c).

The work practice plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

- 1) All organic-HAP containing regulated materials and waste materials must be stored in closed containers.
- 2) Spills of organic-HAP-containing regulated materials, and waste materials must be minimized.
- 3) Organic-HAP-containing regulated materials and waste materials must be conveyed from one location to another in



closed containers or pipes.

4) Mixing vessels which contain organic-HAP-containing regulated materials must be closed except when adding to, removing, or mixing the contents.

5) Emissions of organic HAP must be minimized during cleaning of web coating/printing or dyeing/finishing storage, mixing, and conveying equipment.

Monitoring Frequency: SINGLE OCCURRENCE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2016.
Subsequent reports are due every 6 calendar month(s).

Condition 46: Compliance Certification
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable Federal Requirement: 6 NYCRR 228-1.4 (d) (2)

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00000

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

Item 46.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Fabric coating lines, including but limited to: rubber that is used for rainwear, tents, and industrial gaskets, may not use coatings with VOC contents, as applied, which exceed 2.9 pounds of VOC per gallon of coating (minus water and excluded compounds).

The facility must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility (228-1.3(b)(1)).

The facility must, upon request by the department, use Method 311 or Method 24, included in Appendix A of both 40 CFR parts 63 and 60, respectively (see table 1, section 200.9 of this Title), to measure the volatile content, water content, density, volume of solids, and weight of

New York State Department of Environmental Conservation

Permit ID: 3-3924-00173/00010

Facility DEC ID: 3392400173



solids in order to determine the actual VOC content of an
as applied coating during a compliance demonstration
(228-1.6(a))

Parameter Monitored: VOC CONTENT

Lower Permit Limit: 0 pounds per gallon

Upper Permit Limit: 2.9 pounds per gallon

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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 47: Contaminant List
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable State Requirement:ECL 19-0301

Item 47.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0
Name: TOTAL HAP



CAS No: 0NY998-00-0

Name: VOC

Condition 48: Malfunctions and start-up/shutdown activities
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable State Requirement:6 NYCRR 201-1.4

Item 48.1:

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

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

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

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

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

Condition 49: Visible Emissions Limited
Effective between the dates of 01/12/2016 and 01/11/2021

Applicable State Requirement:6 NYCRR 211.2

Item 49.1:

New York State Department of Environmental Conservation

Permit ID: 3-3924-00173/00010

Facility DEC ID: 3392400173



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.

