

**New York State Department of Environmental Conservation  
Facility DEC ID: 4270100014**



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 4-2701-00014/00011  
Effective Date: 06/15/2001                      Expiration Date: No expiration date

Permit Issued To: XXXXXX X XXXXXXXX  
XXXXXXXXXXXXXXXXXXXX  
XXXXXXXXXXXXXXXXXXXX

Contact: KLAUS BECKMANN  
GEM URETHANE  
14 PARK DR PO BOX 390  
AMSTERDAM, NY 12010-0390  
(518) 842-0073

Facility: GEM URETHANE SUB OF FAB INDUSTRIES INC  
14 PARK DR  
AMSTERDAM, NY 12010-0390

Description:

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: JOHN H FELTMAN  
DIVISION OF ENVIRONMENTAL PERMITS  
615 ERIE ST WEST  
SYRACUSE, NY 13204-2400

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 4  
HEADQUARTERS



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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

**Item 2.1:**

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

**Condition 3: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13(a)**

**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.

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

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**Item 4.1:**

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

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

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5:      Submission of Applications for Permit Modification or Renewal -REGION 4  
                         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 4 Headquarters  
Division of Environmental Permits  
1150 North Westcott Rd.  
Schenectady, NY 12306-2014  
(518) 357-2069



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: XXXXXX X XXXXXXXX  
XXXXXXXXXXXXXXXXXXXX  
XXXXXXXXXXXXXXXXXXXX

Facility: GEM URETHANE SUB OF FAB INDUSTRIES INC  
14 PARK DR  
AMSTERDAM, NY 12010-0390

Authorized Activity By Standard Industrial Classification Code:  
3567 - INDUSTRIAL FURNACES AND OVENS

Permit Effective Date: 06/15/2001

Permit Expiration Date: No expiration date.



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6NYCRR 200.5: Sealing
- 2 6NYCRR 200.6: Acceptable ambient air quality
- 3 6NYCRR 200.7: Maintenance of equipment
- 4 6NYCRR 201-1.2: Unpermitted Emission Sources
- 5 6NYCRR 201-1.4: Unavoidable Noncompliance and Violations
- 6 6NYCRR 201-1.5: Emergency Defense
- 7 6NYCRR 201-1.7: Recycling and Salvage
- 8 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the Air
- 9 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 10 6NYCRR 201-3.2(a): Proof of Eligibility
- 11 6NYCRR 201-3.3(a): Proof of Eligibility
- 12 6NYCRR 201-6: Facility Permissible Emissions
- \*13 6NYCRR 201-6: Compliance Demonstration
- \*14 6NYCRR 201-6: Compliance Demonstration
- \*15 6NYCRR 201-6: Compliance Demonstration
- 16 6NYCRR 201-7.2: Synthetic minor facility capping provisions.
- 17 6NYCRR 202-1.1: Required emissions tests
- 18 6NYCRR 211.3: Visible emissions limited.
- 19 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites

**Emission Unit Level**

**EU=G-ENRAL**

- 20 6NYCRR 212.4(b): Emissions from new emission sources and/or modifications not specified by Table 2
- 21 6NYCRR 212.6(a): Compliance Demonstration
- 22 6NYCRR 228.4: Compliance Demonstration
- 23 6NYCRR 228.5(a): Compliance Demonstration
- 24 6NYCRR 228.5(b): method 24 40 CFR 60
- 25 6NYCRR 228.5(c): Alternative Analytical Methods
- 26 6NYCRR 228.5(d): samples
- 27 6NYCRR 228.6(a): prohibition of sale or specification
- 28 6NYCRR 228.6(b): certification
- 29 6NYCRR 228.7: Compliance Demonstration
- 30 6NYCRR 228.10: Handling, storage and disposal of volatile organic compounds

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 31 6NYCRR 201-5: General Provisions
- 32 6NYCRR 201-5: Permit Exclusion Provisions

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33 6NYCRR 201-5: Emission Unit Definition

34 6NYCRR 201-5.3(b): Contaminant List

35 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

36 6NYCRR 201-5: Emission Point Definition By Emission Unit

37 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



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**FEDERALLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**Condition 1: Sealing**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 200.5**

**Item 1.1:**

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

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

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

**Condition 2: Acceptable ambient air quality**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 200.6**

**Item 2.1:**

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 3: Maintenance of equipment**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 200.7**

**Item 3.1:**

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.

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**Condition 4: Unpermitted Emission Sources**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-1.2**

**Item 4.1:**

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

**Condition 5: Unavoidable Noncompliance and Violations**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-1.4**

**Item 5.1:**

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 or certificate issued for the corresponding air contamination source. 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



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of the emission rates.

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

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

**Condition 6: Emergency Defense**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-1.5**

**Item 6.1:**

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.

**Condition 7: Recycling and Salvage**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

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**Applicable Federal Requirement: 6NYCRR 201-1.7**

**Item 7.1:**

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 6 NYCRR.

**Condition 8: Prohibition of Reintroduction of Collected Contaminants to the Air**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-1.8**

**Item 8.1:**

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 9: Public Access to Recordkeeping**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-1.10(a)**

**Item 9.1:**

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

**Condition 10: Proof of Eligibility**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

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

**Item 10.1:**

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

**Condition 11: Proof of Eligibility**



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**Effective between the dates of 06/15/2001 and Permit Expiration Date**

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

**Item 11.1:**

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

**Condition 12: Facility Permissible Emissions**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 12.1:**

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: 000110-80-5                      PTE: 19,900 pounds per year  
Name: ETHANOL, 2-ETHOXY-

CAS No: 0NY100-00-0                      PTE: 49,000 pounds per year  
Name: HAP

CAS No: 0NY998-00-0                      PTE: 99,000 pounds per year  
Name: VOC

**Condition 13: Compliance Demonstration**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 13.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

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Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

TOTAL HAZARDOUS AIR POLLUTANTS (HAP) EMISSIONS FROM ALL FACILITY OPERATIONS WILL BE LIMITED TO LESS THAN TWENTY-FOUR AND ONE HALF (24.5) TONS (49,000 POUNDS) DURING ALL CONSECUTIVE TWELVE (12) MONTH PERIODS. IN ADDITION, INDIVIDUAL HAP EMISSIONS FROM ALL FACILITY OPERATIONS WILL BE LIMITED TO LESS THAN 9.95 TONS (19,900 POUNDS) DURING ALL CONSECUTIVE TWELVE (12) MONTH PERIODS. THE FACILITY SHALL MAINTAIN RECORDS OF THE MONTHLY FACILITY TOTAL HAP AND INDIVIDUAL HAP EMISSIONS AND THE ANNUAL MAXIMUM ROLLED MONTHLY FACILITY TOTAL HAP AND INDIVIDUAL HAP EMISSIONS ON SITE. IN ADDITION, THE FACILITY SHALL MAINTAIN ALL CALCULATIONS AND DATA USED TO DETERMINE THE TOTAL HAP AND INDIVIDUAL HAP EMISSIONS ON SITE. ALL RECORDS SHALL BE MAINTAINED ON SITE FOR A PERIOD OF FIVE YEARS.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 07/14/2002 for the period 06/15/2001 through 06/14/2002

**Condition 14: Compliance Demonstration**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 14.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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**Monitoring Description:**

TOTAL VOLATILE ORGANIC COMPOUNDS (VOC) EMISSIONS FROM ALL FACILITY OPERATIONS WILL BE LIMITED TO LESS THAN FORTY-NINE AND ONE HALF (49.5) TONS (99,000 POUNDS) DURING ALL CONSECUTIVE TWELVE (12) MONTH PERIODS. THE FACILITY SHALL MAINTAIN RECORDS OF THE MONTHLY FACILITY VOC EMISSIONS AND THE ANNUAL MAXIMUM ROLLED MONTHLY FACILITY VOC EMISSIONS ON SITE. IN ADDITION, THE FACILITY SHALL MAINTAIN ALL CALCULATIONS AND DATA USED TO DETERMINE THE VOC EMISSIONS ON SITE. ALL RECORDS SHALL BE MAINTAINED ON SITE FOR A PERIOD OF FIVE YEARS.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 07/14/2002 for the period 06/15/2001 through 06/14/2002

**Condition 15: Compliance Demonstration**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 15.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000110-80-5 ETHANOL, 2-ETHOXY-

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

ETHYLENE GLYCOL MONOETHYL ETHER (CAS NO. 000110-80-5) EMISSIONS FROM ALL FACILITY OPERATIONS WILL BE LIMITED TO LESS THAN 9.95 TONS (19,900 POUNDS) DURING ALL CONSECUTIVE TWELVE (12) MONTH PERIODS. THE FACILITY SHALL MAINTAIN RECORDS OF THE MONTHLY FACILITY ETHYLENE GLYCOL MONOETHYL ETHER (CAS NO. 000110-80-5) EMISSIONS AND THE ANNUAL MAXIMUM ROLLED



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MONTHLY FACILITY ETHYLENE GLYCOL MONOETHYL ETHER (CAS NO. 000110-80-5) EMISSIONS ON SITE. IN ADDITION, THE FACILITY SHALL MAINTAIN ALL CALCULATIONS AND DATA USED TO DETERMINE THE ETHYLENE GLYCOL MONOETHYL ETHER (CAS NO. 000110-80-5) EMISSIONS ON SITE. ALL RECORDS SHALL BE MAINTAINED ON SITE FOR A PERIOD OF FIVE YEARS.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 07/14/2002 for the period 06/15/2001 through 06/14/2002

**Condition 16: Synthetic minor facility capping provisions.  
Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-7.2**

**Item 16.1:**

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

**Item 16.2:**

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 16.3:**

On an annual basis, 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 those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

**Item 16.4:**

The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of Part 201 and of the Act.

**Condition 17: Required emissions tests  
Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 202-1.1**



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**Item 17.1:**

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

**Condition 18: Visible emissions limited.**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 211.3**

**Item 18.1:**

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

**Condition 19: Open Fires Prohibited at Industrial and Commercial Sites**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 215**

**Item 19.1:**

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

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

**Condition 20: Emissions from new emission sources and/or modifications  
not specified by Table 2**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(b)**

**Item 20.1:**

This Condition applies to Emission Unit: G-ENRAL

**Item 20.2:**

For gases and liquid particulates with an environmental rating of A, B, or C and for solid particulates with an environmental rating of A, where the emission rate potential is not shown in Table 2 the permissible emission rate shall be specified by the commissioner.

**Condition 21: Compliance Demonstration**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**



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**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 21.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: G-ENRAL

**Item 21.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 22: Compliance Demonstration**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.4**

**Item 22.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: G-ENRAL

**Item 22.2:**

Compliance Demonstration 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

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emission source subject to 6NYCRR Part 228.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: METHOD 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION**

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 23: Compliance Demonstration**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.5(a)**

**Item 23.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: G-ENRAL

**Item 23.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
**DESCRIPTION**

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 24: method 24 40 CFR 60**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.5(b)**



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**Item 24.1:**

This Condition applies to Emission Unit: G-ENRAL

**Item 24.2:**

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

**Condition 25: Alternative Analytical Methods**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.5(c)**

**Item 25.1:**

This Condition applies to Emission Unit: G-ENRAL

**Item 25.2:**

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

**Condition 26: samples**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.5(d)**

**Item 26.1:**

This Condition applies to Emission Unit: G-ENRAL

**Item 26.2:**

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

**Condition 27: prohibition of sale or specification**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.6(a)**

**Item 27.1:**

This Condition applies to Emission Unit: G-ENRAL

**Item 27.2:**

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 of 6NYCRR Part 228 if such use is prohibited. This 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:

- (1) coatings utilized at surface coating lines where control equipment has been installed to



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meet the allowable VOC content limitations specified in tables 1 and 2 of Part 228;

- (2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Part 228; and
- (3) coatings utilized at surface coating lines that have been granted variances for reasons of technological and economic feasibility.

**Condition 28: certification**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.6(b)**

**Item 28.1:**

This Condition applies to Emission Unit: G-ENRAL

**Item 28.2:**

Any person selling a coating for use in a coating line subject to 6NYCRR Part 228 must, upon request, provide the user with certification of the volatile organic compound content of the coating supplied.

**Condition 29: Compliance Demonstration**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.7**

**Item 29.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: G-ENRAL

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 29.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings applied to fabric may contain no more than 2.9 pounds of volatile organic compounds per gallon of coating, (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon



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Reference Test Method: Method 24 (40 CFR60)

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 30: Handling, storage and disposal of volatile organic  
compounds  
Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.10**

**Item 30.1:**

This Condition applies to Emission Unit: G-ENRAL

**Item 30.2:**

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

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

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**STATE ONLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**Condition 31: General Provisions**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 31.1:**

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

**Item 31.2:**

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.

**Item 31.3:**

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.

**Condition 32: Permit Exclusion Provisions**

**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 32.1:**

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 currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant 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 by the Department and the receipt thereof by the Applicant does not supercede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements



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contained in such order or modification thereof unless specifically intended by this permit.

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 the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not addressed in this permit.

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 the right of the Department to pursue any claims for natural resource damages against the Applicant.

**Condition 33: Emission Unit Definition**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 33.1:**

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

Emission Unit: G-ENRAL

Emission Unit Description:

EMISSION UNIT G-ENRAL WILL CONSIST OF ALL FACILITY OPERATIONS, AS THE FOUR PERMITTED SOURCES ARE EACH CONNECTED TO A SINGLE EMISSION POINT. UNIT OPERATIONS INCLUDE: ADHESIVE LAMINATOR (PROCESS 101), FLAME LAMINATOR (PROCESS 102), HOT MELT LAMINATOR (PROCESS 103) AND PRINT MACHINE #2 (PROCESS 104). THE EMISSION UNIT HAS FOUR PROCESSES (101-104), ONE (1) EMISSION POINT (00031), FOUR EMISSION SOURCES (001-004) AND NO EMISSION CONTROL DEVICES ASSOCIATED WITH IT.

Building(s): MAIN

**Condition 34: Contaminant List**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

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

**Item 34.1:**

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



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CAS No: 000110-80-5

Name: ETHANOL, 2-ETHOXY-

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY998-00-0

Name: VOC

**Condition 35: Air pollution prohibited**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 211.2**

**Item 35.1:**

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.

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

**Condition 36: Emission Point Definition By Emission Unit**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 36.1:**

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

Emission Unit: G-ENRAL

Emission Point: 20031

Height (ft.): 240

Diameter (in.): 134

NYTMN (km.): 4752.9

NYTME (km.): 567.1

Building: MAIN

**Condition 37: Process Definition By Emission Unit**  
**Effective between the dates of 06/15/2001 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 37.1:**

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

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Emission Unit: G-ENRAL

Process: 101

Process Description:

ADHESIVE LAMINATOR PRODUCES AQUA TECH PRODUCT, AND CURRENTLY RUNS AT TOP SPEED ALLOWABLE DUE TO CURING TIME REQUIREMENTS FOR PLASTICS. NO EMISSION CONTROL DEVICE WILL BE USED FOR THE PROCESS.

Emission Source/Control: 00001 - Process

**Item 37.2:**

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

Emission Unit: G-ENRAL

Process: 102

Process Description:

FLAME LAMINATOR OPERATES USING AN OPEN CELL POLYESTER OR POLYETHER BASED POLURETHANE FOAM, SURFACE MOLTEN BY A BANK OF NATURAL GAS FLAMES ACROSS THE WIDTH OF THE FOAM. THE MOLTEN FOAM BECOMES THE BONDING LINK BETWEEN THE NON-MOLTEN PART OF THE FOAM AND A FABRIC. ACCORDING TO THE MSDS FOR THE FOAM PRODUCT USED (UNIFOAM 1.8C POLYURETHANE FOAM), COMBUSTION OF FOAM MATERIAL MAY PRODUCE CARBON MONOXIDE, OXIDES OF NITROGEN AND TRACES OF ISOCYANATES AND HYDROGEN CYANIDE. EMISSIONS FROM THE PROCESS ARE ASSUMED TO BE TRIVIAL, AND NO EMISSION CONTROL DEVICE WILL BE USED FOR THE PROCESS.

Emission Source/Control: 00002 - Process

**Item 37.3:**

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

Emission Unit: G-ENRAL

Process: 103

Process Description:

UNIT IS A PVR REACTIVE SYSTEM, WITH TWO HOT MELT ADHESIVES CURRENTLY USED IN PRODUCTION. NO EMISSION CONTROL DEVICE WILL BE USED FOR THE UNIT.



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Emission Source/Control: 00003 - Process

**Item 37.4:**

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

Emission Unit: G-ENRAL

Process: 104

Process Description:

PRODUCTION OF SANDEL PRODUCTS OCCURS AT THE OIL RIG MACHINE, WITH USE OF A TOP COAT AND BASE COAT IN THE PRODUCTION PROCESS. THE SANDEL FORMULATION 14502 IS BEING USED FOR A NUMBER OF DIFFERENT FINISHED PRODUCT SANDEL STYLES. THE DIFFERENCES IN THE FINISHED PRODUCTS ARE THE BASE FABRICS AND THE NUMBER OF MACHINE PASSES. NO EMISSION CONTROL DEVICE WILL BE USED FOR THE UNIT.

Emission Source/Control: 00004 - Process