

New York State Department of Environmental Conservation
Facility DEC ID: 4382800031



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 4-3828-00031/00023
Effective Date: 02/13/2003 Expiration Date: No expiration date

Permit Issued To: SAINT-GOBAIN PERFORMANCE PLASTICS CORPORATION
150 DEY RD
WAYNE, NJ 07470

Facility: SAINT GOBAIN PERFORMANCE PLASTICS
1 LIBERTY STREET
HOOSICK FALLS, NY 12090

Contact: EDWARD J CHANNING
ST GOBAIN PERFORMANCE PLASTICS
14 MCCAFFREY ST
HOOSICK FALLS, NY 12090

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: ARTHUR N HENNINGSON
DIVISION OF ENVIRONMENTAL PERMITS
1150 NORTH WESTCOTT RD
SCHENECTADY, NY 12306-2014

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

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

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

New York State Department of Environmental Conservation
Facility DEC ID: 4382800031



transfer of ownership.

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

Item 4.1:

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

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

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 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



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: SAINT-GOBAIN PERFORMANCE PLASTICS CORPORATION
150 DEY RD
WAYNE, NJ 07470

Facility: SAINT GOBAIN PERFORMANCE PLASTICS
1 LIBERTY STREET
HOOSICK FALLS, NY 12090

Authorized Activity By Standard Industrial Classification Code:
2295 - COATED FABRICS, NOT



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 201-7.1: Facility Permissible Emissions
- 2 40CFR 60.7(a), NSPS Subpart A: Date of construction notification - If a COM is not used.

Emission Unit Level

- 3 6NYCRR 201-7.1: Emission Unit Permissible Emissions

EU=C-OATNG

- 4 6NYCRR 228.4: Compliance Demonstration
- 5 6NYCRR 231-2: Compliance Demonstration
- 6 40CFR 60.4, NSPS Subpart A: EPA Region 2 address.
- 7 40CFR 60.7(b), NSPS Subpart A: Recordkeeping requirements.
- 8 40CFR 60.7(c), NSPS Subpart A: Excess emissions report.
- 9 40CFR 60.7(d), NSPS Subpart A: Excess Emissions Report
- 10 40CFR 60.7(f), NSPS Subpart A: Facility files for subject sources.
- 11 40CFR 60.8(a), NSPS Subpart A: Performance testing timeline.
- 12 40CFR 60.8(b), NSPS Subpart A: Performance test methods.
- 13 40CFR 60.8(c), NSPS Subpart A: Required performance test information.
- 14 40CFR 60.8(d), NSPS Subpart A: Prior notice.
- 15 40CFR 60.8(e), NSPS Subpart A: Performance testing facilities.
- 16 40CFR 60.8(f), NSPS Subpart A: Number of required tests.
- 17 40CFR 60.9, NSPS Subpart A: Availability of information.
- 18 40CFR 60.11, NSPS Subpart A: Opacity standard compliance testing.
- 19 40CFR 60.12, NSPS Subpart A: Circumvention.
- 20 40CFR 60.13, NSPS Subpart A: Monitoring requirements.
- 21 40CFR 60.14, NSPS Subpart A: Modifications.
- 22 40CFR 60.15, NSPS Subpart A: Reconstruction.
- 23 40CFR 60.443(d), NSPS Subpart RR: Compliance Demonstration
- 24 40CFR 60.443(e), NSPS Subpart RR: Compliance Demonstration
- 25 40CFR 60.444(c), NSPS Subpart RR: Compliance Demonstration
- 26 40CFR 60.445(e), NSPS Subpart RR: Compliance Demonstration
- 27 40CFR 60.447, NSPS Subpart RR: Compliance Demonstration
- 28 40CFR 63.3320(b)(1), Subpart JJJJ: Compliance Demonstration
- 29 40CFR 63.3330(b), Subpart JJJJ: Compliance date for new affected sources
- 30 40CFR 63.3340, Subpart JJJJ: General requirements -
startup/shutdown/malfunction plans
- 31 40CFR 63.3350(c)(4), Subpart JJJJ: Compliance Demonstration
- 32 40CFR 63.3350(e), Subpart JJJJ: Compliance Demonstration
- 33 40CFR 63.3350(f), Subpart JJJJ: Compliance Demonstration
- 34 40CFR 63.3360(e), Subpart JJJJ: Compliance Demonstration
- 35 40CFR 63.3360(f), Subpart JJJJ: Compliance Demonstration
- 36 40CFR 63.3370(e), Subpart JJJJ: Compliance Demonstration



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

- 37 40CFR 63.3370(n), Subpart JJJJ: Compliance Demonstration
- 38 40CFR 63.3400(b), Subpart JJJJ: Compliance Demonstration
- 39 40CFR 63.3400(c), Subpart JJJJ: Compliance Demonstration
- 40 40CFR 63.3400(d), Subpart JJJJ: Compliance Demonstration
- 41 40CFR 63.3400(e), Subpart JJJJ: Compliance Demonstration
- 42 40CFR 63.3400(f), Subpart JJJJ: Compliance Demonstration
- 43 40CFR 63.3400(g), Subpart JJJJ: Compliance Demonstration
- 44 40CFR 63.3410, Subpart JJJJ: Compliance Demonstration

EU=C-OATNG,Proc=CL1

- 45 40CFR 60.442(a), NSPS Subpart RR: Compliance Demonstration

EU=C-OATNG,Proc=CL2

- 46 40CFR 60.442(a), NSPS Subpart RR: Compliance Demonstration
- 47 40CFR 60.742(a), NSPS Subpart VVV: Compliance Demonstration
- 48 40CFR 60.742(b)(2), NSPS Subpart VVV: Compliance Demonstration
- 51 40CFR 60.747(d), NSPS Subpart VVV: Compliance Demonstration

EU=C-OATNG,Proc=CL3

- 49 40CFR 60.442(a), NSPS Subpart RR: Compliance Demonstration

EU=C-OATNG,Proc=CL4

- 50 40CFR 60.442(a), NSPS Subpart RR: Compliance Demonstration

EU=C-OATNG,EP=00001

- 52 6NYCRR 201-7.1: Compliance Demonstration
- *53 6NYCRR 201-7.1: Compliance Demonstration
- *54 6NYCRR 201-7.1: Compliance Demonstration
- *55 6NYCRR 201-7.1: Compliance Demonstration
- 56 6NYCRR 228.5(e)(2): control equipment other than VOC/solvent recovery
- 57 6NYCRR 228.5(f): Control requirement
- 58 6NYCRR 228.5(g)(1): exhaust gas temperature
- 59 6NYCRR 228.10: Handling, storage and disposal of volatile organic compounds

EU=C-OATNG,EP=00001,Proc=CL1

- 60 6NYCRR 228.3(b): Compliance Demonstration

EU=C-OATNG,EP=00001,Proc=CL2

- 61 6NYCRR 228.3(b): Compliance Demonstration
- 62 40CFR 60.740(b), NSPS Subpart VVV: Applicability and designation of affected facility.

EU=C-OATNG,EP=00001,Proc=CL3

- 63 6NYCRR 228.3(b): Compliance Demonstration



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

EU=C-OATNG,EP=00001,Proc=CL4

64 6NYCRR 228.3(b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

65 ECL 19-0301: Contaminant List

66 6NYCRR 201-1.4: Unavoidable noncompliance and violations

67 6NYCRR 201-5: Emission Unit Definition

68 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

69 6NYCRR 201-5: Emission Point Definition By Emission Unit

70 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.RUBBERIZED
2672 - PAPER COATED AND LAMINATED, NEC

Permit Effective Date: 02/13/2003

Permit Expiration Date: No expiration date.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



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

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

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

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

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

Item E: Emergency Defense - 6NYCRR Part 201-1.5

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

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

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

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

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

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

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

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

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

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

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

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

Item J: Required Emission Tests - 6 NYCRR Part 202-1.1

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

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item L: Open Fires - 6 NYCRR Part 215

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

Item M: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

FEDERAL APPLICABLE REQUIREMENTS

The following conditions are federally enforceable.

Condition 1: Facility Permissible Emissions

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 1.1:

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: 000108-88-3 PTE: 19,000 pounds per year
Name: TOLUENE

CAS No: 001330-20-7 PTE: 19,000 pounds per year
Name: XYLENE, M, O & P MIXT.

CAS No: 0NY100-00-0 PTE: 48,000 pounds per year
Name: HAP

Condition 2: Date of construction notification - If a COM is not used.

Effective between the dates of 02/13/2003 and Permit Expiration Date

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Applicable Federal Requirement: 40CFR 60.7(a), NSPS Subpart A

Item 2.1:

Any owner or operator subject to this part shall furnish the Administrator with the following information:

- 1) a notification of the date construction or reconstruction commenced, post marked no later than 30 days after such date;
- 3) a notification of the actual date of initial start up, post marked within 15 days after such date;
- 4) a notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless the change is specifically exempted under this part. The notice shall be post marked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capability of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional information regarding the change;
- 5) a notification of the date upon which the demonstration of continuous monitoring system performance commences, post marked not less than 30 days prior to such date;
- 6) a notification of the anticipated date for conducting the opacity observations, post marked not less than 30 days prior to such date.

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

**Condition 3: Emission Unit Permissible Emissions
Effective between the dates of 02/13/2003 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 3.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: C-OATNG

CAS No: 000108-88-3

Name: TOLUENE

PTE(s): 9.23 pounds per hour
19,000 pounds per year

CAS No: 001330-20-7

Name: XYLENE, M, O & P MIXT.



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

PTE(s): 2.34 pounds per hour
19,000 pounds per year

CAS No: 0NY100-00-0

Name: HAP

PTE(s): 13.17 pounds per hour
48,000 pounds per year

Condition 4: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.4

Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A visual emission observation must take place once each week during daylight hours while the emission point(s) and/or emission source(s) (EP/ES) identified for this condition is/are in operation.

The facility owner/operator shall conduct a visible emissions "periodic monitoring" observation to determine the presence or absence of visible emissions of the EP/ES once per week when the facility operating. The observation shall be conducted during daylight hours, except during conditions of extreme weather (fog, snow, rain).

Observation of visible emissions at the EP/ES requires that a follow-up observation be performed the next operating day at the noted EP/ES. Observations of visible emissions for two consecutive operating days at the same EP/ES will require that a Method 9 analysis be performed for that EP/ES no later than two operating days after the follow-up observation.

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



The Regional Air Pollution Control Engineer (RAPCE) will be notified within one business day of performing the Method 9 analysis if the opacity standard is contravened. Upon RAPCE notification, corrective actions shall be indicated to the Department. No person shall 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.

Documentation will be maintained, by keeping records as appropriate, to demonstrate compliance. Records of weekly observations shall include but not be limited to the following data: observer's name, time of day of observation, identity of EP/ES, were visible emissions observed, were visible emissions observed for two consecutive days. The records shall also include details of the Method 9 analyses if performed. Records shall be in a format acceptable to the Department, include pertinent supporting data and calculations as necessary, be retained at the facility for five years after the date of the last entry, and upon request, be made available for Department review.

The Department reserves the right to perform or require the performance of a Method 9 analysis at any time during facility operation.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Rm 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 5: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 231-2

Item 5.1:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IN ORDER TO CAP OUT OF THE REQUIREMENTS OF 6 NYCRR PART 231 (NEW SOURCE REVIEW), SGPPL WILL CAP EMISSIONS OF VOLATILE ORGANIC COMPOUNDS (VOC) AT LESS THAN 36 TONS (72,000 POUNDS) PER 12 MONTH ROLLING PERIOD. SGPPL WILL TRACK THE AMOUNT OF PRODUCT USED AT THE FACILITY ON A MONTHLY AND 12 MONTH ROLLING BASIS TO DEMONSTRATE COMPLIANCE WITH IT'S CAP.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 72000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 6: EPA Region 2 address.

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.4, NSPS Subpart A

Item 6.1:

This Condition applies to Emission Unit: C-OATNG

Item 6.2:

All requests, reports, applications, submittals, and other communications to the Administrator pursuant to this part shall be submitted in duplicate to the following address:

Director, Division of Enforcement and Compliance Assistance

USEPA Region 2

290 Broadway, 21st Floor



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

New York, NY 10007-1886

Copies of all correspondence to the administrator pursuant to this part shall also be submitted to the NYSDEC Regional Office issuing this permit (see address at the beginning of this permit) and to the following address:

NYSDEC
Bureau of Enforcement and Compliance Assurance
625 Broadway
Albany, NY 12233-3258

Condition 7: Recordkeeping requirements.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.7(b), NSPS Subpart A

Item 7.1:

This Condition applies to Emission Unit: C-OATNG

Item 7.2:

Affected owners or operators shall maintain records of occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

Condition 8: Excess emissions report.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.7(c), NSPS Subpart A

Item 8.1:

This Condition applies to Emission Unit: C-OATNG

Item 8.2:

Affected owners or operators shall submit an excess emissions report quarterly (or more frequently as required by the applicable Subpart or the Administrator), to the Administrator. These reports shall be post marked no later than 30 days after each calendar quarter (or as appropriate), and shall contain the following information:

- 1) the magnitude of excess emissions computed, any conversion factors used, the date and time of each occurrence, and the process operating time during the reporting period;
- 2) specific identification of each period of excess emissions that occur during startup, shutdown, or malfunction, where the nature, cause, and corrective action are provided for a malfunction;



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

3) the date and time identifying each period during which the continuous monitoring system was inoperative except for zero span checks and the nature of the system repairs or adjustments; and

4) when no excess emissions have occurred or when the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be provided in the report.

Condition 9: Excess Emissions Report
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.7(d), NSPS Subpart A

Item 9.1:

This Condition applies to Emission Unit: C-OATNG

Item 9.2:

A summary report form, for each pollutant monitored, shall be sent to the Administrator in the form prescribed in Figure 1 of 40 CFR Part 60.7(d).

Condition 10: Facility files for subject sources.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.7(f), NSPS Subpart A

Item 10.1:

This Condition applies to Emission Unit: C-OATNG

Item 10.2:

The following files shall be maintained at the facility for all affected sources: all measurements, including continuous monitoring systems, monitoring device, and performance testing measurements; all continuous monitoring system evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part, recorded in permanent form suitable for inspection. The file shall be maintained for at least two years following the date of such measurements, reports, and records.

Condition 11: Performance testing timeline.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.8(a), NSPS Subpart A

Item 11.1:

This Condition applies to Emission Unit: C-OATNG

Item 11.2:

Within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup of the facility, the owner or operator of the facility shall conduct performance testing and provide the results of such tests, in a written report, to the Administrator.



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Condition 12: Performance test methods.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.8(b), NSPS Subpart A

Item 12.1:

This Condition applies to Emission Unit: C-OATNG

Item 12.2:

Performance testing shall be conducted in accordance with the methods and procedures prescribed in this part or by alternative methods and procedures approved by the Administrator.

Condition 13: Required performance test information.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.8(c), NSPS Subpart A

Item 13.1:

This Condition applies to Emission Unit: C-OATNG

Item 13.2:

Performance tests shall be conducted under such conditions specified by the Administrator, based upon representative performance data supplied by the owner or operate of the facility.

Condition 14: Prior notice.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.8(d), NSPS Subpart A

Item 14.1:

This Condition applies to Emission Unit: C-OATNG

Item 14.2:

The owner or operator shall provide the Administrator with prior notice of any performance test at least 30 days in advance of testing.

Condition 15: Performance testing facilities.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.8(e), NSPS Subpart A

Item 15.1:

This Condition applies to Emission Unit: C-OATNG

Item 15.2:

The following performance testing facilities shall be provided during all tests:



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

- 1) sampling ports adequate for tests methods applicable to such facility;
- 2) a safe sampling platform;
- 3) a safe access to the sampling platform; and
- 4) utilities for sampling and testing equipment.

Condition 16: Number of required tests.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.8(f), NSPS Subpart A

Item 16.1:

This Condition applies to Emission Unit: C-OATNG

Item 16.2:

Each performance test shall consist of three separate runs, at the specified duration required in the applicable test method. Compliance with all applicable standards shall be determined by using the arithmetic means of the results of the three runs.

Condition 17: Availability of information.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.9, NSPS Subpart A

Item 17.1:

This Condition applies to Emission Unit: C-OATNG

Item 17.2:

The availability to the public of information provided to, or otherwise obtained by, the Administrator under this part shall be governed by part 2 of this chapter.

Condition 18: Opacity standard compliance testing.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.11, NSPS Subpart A

Item 18.1:

This Condition applies to Emission Unit: C-OATNG

Item 18.2:

The following conditions shall be used to determine compliance with the opacity standards:

- 1) observations shall be conducted in accordance with Reference Method 9, in Appendix A or this Part 40 CFR 60(or an equivalent method approved by the Administrator including continuous opacity monitors);

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



2) the opacity standards apply at all times except during periods of start up, shutdown, and malfunction; and

3) all other applicable conditions cited in section 60.11 of this part.

Condition 19: Circumvention.

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.12, NSPS Subpart A

Item 19.1:

This Condition applies to Emission Unit: C-OATNG

Item 19.2:

No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

Condition 20: Monitoring requirements.

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.13, NSPS Subpart A

Item 20.1:

This Condition applies to Emission Unit: C-OATNG

Item 20.2:

All continuous monitoring systems and devices shall be installed, calibrated, maintained, and operated in accordance with the requirements of section 60.13.

Condition 21: Modifications.

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.14, NSPS Subpart A

Item 21.1:

This Condition applies to Emission Unit: C-OATNG

Item 21.2:

Within 180 days of the completion of any physical or operational change (as defined in section 60.14), compliance with the applicable standards must be achieved.

Condition 22: Reconstruction.

Effective between the dates of 02/13/2003 and Permit Expiration Date

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Applicable Federal Requirement: 40CFR 60.15, NSPS Subpart A

Item 22.1:

This Condition applies to Emission Unit: C-OATNG

Item 22.2:

The following shall be submitted to the Administrator prior to reconstruction (as defined in section 60.15):

- 1) a notice of intent to reconstruct 60 days prior to the action;
- 2) name and address of the owner or operator;
- 3) the location of the existing facility;
- 4) a brief description of the existing facility and the components to be replaced;
- 5) a description of the existing air pollution control equipment and the proposed air pollution control equipment;
- 6) an estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new facility;
- 7) the estimated life of the facility after the replacements; and
- 8) a discussion of any economic or technical limitations the facility may have in complying with the applicable standards of performance after the proposed replacements.

Condition 23: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

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

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



The owner/operator shall determine the calendar monthly compliance by comparing the monthly required overall VOC emission reduction as calculated in 40CFR60.443(b) to the overall VOC emission reduction demonstrated in the most recent performance test which complied with 40CFR60.442(a)(2). If the monthly required overall VOC emission reduction is less than or equal to the overall VOC emission reduction in the performance test, compliance with 40CFR60.442(a)(2) is achieved. The performance test shall be conducted according to the provisions in 40CFR60.444(c).

Performance test data and the results from the performance test shall be submitted as specified in 40CFR60.8(a). Quarterly reports shall be submitted following the performance test listing the exceedances of the VOC emission limits specified in 40CFR60.442. If there are no exceedances during this period, that shall be reported.

Reference Test Method: 25

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (ANNIVERSARY)

Initial Report Due: 06/11/2003 for the period 02/13/2003 through 05/12/2003

Condition 24: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

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

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 24.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The owner/operator shall continuously record the thermal incinerator temperature during coating operations. All



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

3-hours periods during which the average temperature of the incinerator is more than 28 degrees Celsius (50 F) below the average temperature of the incinerator during the most recent performance test shall be recorded.

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

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

The performance test data and results from the performance test shall be submitted as specified in 40CFR60.8(a). Following the performance test, quarterly reports shall be submitted listing the exceedances of the VOC emission limits. If there were no exceedances during the quarter, the report shall state that there were none. Reports shall also be submitted at the frequency specified in 40CFR60.7(c) when the incinerator temperature drops as defined above. If no such periods occur, this shall be stated in the report.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

Reference Test Method: 25

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 25: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.444(c), NSPS Subpart RR

Item 25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The performance test for affected facilities controlled by a solvent destruction device shall be conducted as described in 40 CFR Part 60.444(c)(1) through (4)(i) through (iii).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 26: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

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

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.447, NSPS Subpart RR

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

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

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The performance test data and results from the performance test shall be submitted as specified in 40CFR Part 60.8(a).

Following the performance test, quarterly reports shall be submitted listing the exceedances of the VOC emission limits. If there were no exceedances during the quarter, the report shall state that there were none.

Reports shall also be submitted semi-annually which shall report when the incinerator temperature drops as defined above. If no such periods occur, this shall be stated in the report.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 28: Compliance Demonstration



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3320(b)(1), Subpart JJJJ

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall limit organic HAP emissions to no more than 2% of the organic HAP applied for each month (98% reduction) on and after the compliance date set forth in §63.3330. Compliance shall be demonstrated according to the provisions in §63.3370.

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 29: Compliance date for new affected sources

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3330(b), Subpart JJJJ

Item 29.1:

This Condition applies to Emission Unit: C-OATNG

Item 29.2:

If the facility owns or operates a new affected source (defined as having commenced construction or reconstruction after September 13, 2000), the compliance date for the affected source is immediately upon startup or by December 4, 2002, whichever is later. Any performance tests required in §63.3360 must be completed within the time limits set forth in §63.7(a)(2).

Condition 30: General requirements - startup/shutdown/malfunction plans

Effective between the dates of 02/13/2003 and Permit Expiration Date

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Applicable Federal Requirement: 40CFR 63.3340, Subpart JJJJ

Item 30.1:

This Condition applies to Emission Unit: C-OATNG

Item 30.2:

Table 2 to Subpart JJJJ specifies the provisions of 40CFR63, Subpart A that apply to this facility. One provision that applies to this facility is the requirement for a startup, shutdown, and malfunction plan (SSMP) in §63.6(e)(3) for affected sources using a control device to comply with the emission standards.

Condition 31: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3350(c)(4), Subpart JJJJ

Item 31.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 31.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Following the date on which the initial performance test of a control device is completed to demonstrate continuing compliance with the standards, the facility must monitor and inspect each capture system and each control device used to comply with §63.3320.

If the facility owns or operates web coating lines with intermittently-controlled work stations, the facility must monitor bypasses of the control device and the mass of each coating material applied at the work station during any such bypass. If using a control device for complying with the requirements of Subpart JJJJ, the facility must demonstrate that any coating material applied on a never-controlled work station or an intermittently-controlled work station operated in bypass mode is allowed in the compliance demonstration according to §63.3370(n) and (o).



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

If the facility chooses to monitor the bypass lines by using an automatic shutdown system which stops the web coating line when flow is diverted away from the control device to any bypass line when the control device is in operation, the facility must inspect the automatic system at least once per month to verify that it will detect diversions of flow and will shut down operations in the event of such a diversion.

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 32: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3350(e), Subpart JJJJ

Item 32.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 32.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

If the facility is using a non-catalytic oxidizer to comply with the emission limits in §63.3320, the facility must install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart records, data logger, or temperature indicator must be replaced. The facility must replace the equipment whether the facility chooses not to perform the calibration or the equipment cannot be calibrated properly.

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



The facility must install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of +/-1% of the temperature being monitored in degrees Celsius, or +/-1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

The continuous temperature monitoring system must meet the requirements in §63.3350(e)(1)-(8).

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 760 degrees Centigrade (or Celsius)

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 33: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3350(f), Subpart JJJJ

Item 33.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 33.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility is complying with the emission limits in §63.3320 through the use of a capture system and control device for one or more coating lines, the facility must develop a site-specific monitoring plan containing the following information for these capture systems:



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

- 1) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained.
- 2) The monitoring plan must explain why this parameter is appropriate for demonstrating ongoing compliance.
- 3) The monitoring plan must identify the specific monitoring procedures
- 4) The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in §63.3320. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

The facility must monitor the capture system in accordance with the site-specific monitoring plan. Any deviation from the operating parameter value or range of values will be considered a deviation from the emission limit. The facility must review and update the capture system monitoring plan at least annually and make the plan available for inspection by the NYSDEC upon request.

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 7/30/2003.

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

Condition 34: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3360(e), Subpart JJJJ

Item 34.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 34.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Monitoring Description:

If the facility is using an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in §63.3320, the facility must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in §63.3360(e)(1) and (2).

If the facility is using one or more add-on control devices other than a solvent recovery system for which the facility conducts a liquid-liquid material balance to comply with the emission standards in §63.3320, the facility must establish the applicable operating limits required by §63.3321 during the performance test. These operating limits apply to each add-on control device.

For a thermal oxidizer, the facility must establish the operating limits according to the provisions listed in §63.3360(e)(3)(i).

For a catalytic oxidizer, the facility must establish the operating limits according to the provisions listed in §63.3360(e)(3)(ii).

Reference Test Method: see description

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 35: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3360(f), Subpart JJJJ

Item 35.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Item 35.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility is demonstrating compliance by meeting the requirements in 8963.3370(e), (f), (g), (h), (i)(2), (k), (n)(2), or (3), or (p), the facility must determine capture efficiency using the following procedures:

1) The facility may assume the capture efficiency equals 100% if you capture system is a permanent total enclosure (PTE). The facility must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40CFR51, appendix M, and that all exhaust gases from the enclosure are delivered to a control device.

2) The facility may determine capture efficiency according to the protocols for testing with temporary total enclosures that are specified in Methods 204 and 204A-F of 40CFR51, appendix M. The facility may exclude never-controlled work stations from such capture efficiency determinations.

3) The facility may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in appendix A of subpart KK of Part 63. The facility may exclude never-controlled work stations from such capture efficiency determinations.

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 36: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3370(e), Subpart JJJJ

Item 36.1:



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 36.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility may choose to comply with the emission limits in §63.3320(b)(1) by installing a permanent total enclosure (PTE) around the web coating line that achieves 100% capture efficiency and ventilation of all organic HAP emissions from the PTE to an oxidizer with an outlet organic HAP concentration of no greater than 20 ppmv by compound on a dry basis.

The facility must demonstrate that a PTE is installed that meets the requirements in §63.3360(f)(1).

The facility must also determine the organic HAP concentration at the outlet of the PTE by either determining the control device efficiency using Equation 2 of §63.3360 and the applicable test methods and procedures specified in §63.3360(e) or by using a continuous emission monitoring system (CEMS) to determine the organic HAP emission rate according to §63.3370(i)(2)(i)-(x).

The facility is in compliance if the installation of a PTE is demonstrated and the organic HAP concentration at the outlet of the incinerator is demonstrated to be no greater than 20 ppmv per compound on a dry basis.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 37: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Applicable Federal Requirement: 40CFR 63.3370(n), Subpart JJJJ

Item 37.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 37.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility operates more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controlled work stations, the facility must calculate organic HAP emissions according to the procedures in §63.3370(n)(1) through (4). The facility must then convert the emissions for the month into the units of the selected compliance option in §63.3320 using the calculation procedures in §63.3370(n)(5)(i)-(iv).

Compliance is demonstrated for the month if all operating parameters required to be monitored under §63.3370(n)(1)-(3) were maintained at the values established in §63.3350 and §63.3360 and the applicable condition in §63.3370(n)(6)(i)-(iv) were met.

Monitoring Frequency: MONTHLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 38: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3400(b), Subpart JJJJ

Item 38.1:

The Compliance Demonstration activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 38.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit an initial notification as required in §63.9(b).

Existing facilities must submit the initial notification no later than December 5, 2004.

New and reconstructed affected sources must submit the initial notification according to the appropriate schedule in §63.9(b).

For the purpose of Subpart JJJJ, a title V or part 70 permit application may be sued in lieu of the initial notification required in §63.9(b).

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 39: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3400(c), Subpart JJJJ

Item 39.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 39.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a semiannual compliance report according to the following schedule:

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



The first compliance report must cover the period beginning on the compliance date that is specified for the affected source in §63.3330 and ending on June 30 or December 31, whichever date is the first date following the end of the calendar half immediately following the compliance date. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the calendar half immediately following the compliance date.

Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual period from July 1 to December 31. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

The semiannual compliance report shall contain the following information:

- company name and address
- statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report
- date of report and beginning and ending dates of the reporting period
- if there were no deviations from any emission limitations (emission limit or operating limit) that apply to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no continuous monitoring system was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- for each deviation from an emission limitation (emission limit or operating limit) that applied to the facility and that occurs at an affected source where the facility is not using a continuous emission monitoring system to comply with the emission limitations, the compliance report must contain the total operating time of each affected source during the reporting period, information on the number, duration, and cause of deviations (including known causes), if applicable, and the corrective action taken, information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

span and other calibration checks.
- for each deviation from an emission limit occurring at an affected source where a CEMS is used, the information in §63.3370(c)(2)(vi)(A)-(J) shall be submitted.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 40: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3400(d), Subpart JJJJ

Item 40.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

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

Item 40.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a Notification of Performance Tests as specified in §63.7 and §63.9(e) if the facility is required to conduct a performance test according to Subpart JJJJ. This notification and the site-specific test plan required under §63.7(c)(2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. Unless EPA objects to the parameter or requests changes, the facility may consider the parameters approved.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 41: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3400(e), Subpart JJJJ



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Item 41.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 41.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a Notification of Compliance Status report as required in §63.9(h),

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 42: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3400(f), Subpart JJJJ

Item 42.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 42.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit performance test reports as specified in §63.10(d)(2) if the facility is using a control device to comply with the emission standard and the facility has not obtained a waiver from the performance test requirement or the facility is not exempted from this requirement by §63.3360(b). The performance test reports must be submitted as part of the notification of compliance status required in §63.3400(e).

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Condition 43: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3400(g), Subpart JJJJ

Item 43.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 43.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit startup, shutdown, and malfunction reports as specified in §63.10(d)(5), except that the provisions in Subpart A of Part 63 pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.

If actions taken by an owner/operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by §63.6(e)(3), the owner/operator must state such information in the report. The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to EPA.

Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in the semiannual report.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 44: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.3410, Subpart JJJJ

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Item 44.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 44.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of an affected source must maintain the following records on a monthly basis for at least five years after each occurrence that requires recordkeeping. The latest two years must be kept on site and readily available, and the remaining 3 years may be kept off-site or on computer or other means as specified in §63.10(b)(1):

- The records specified in §63.10(b)(2) of all measurements needed to demonstrate compliance with Subpart JJJJ, including continuous emission monitor data in accordance with §63.3350(d)
- control device and capture system operating parameter data in accordance with §63.3350(c),(e), and (f)
- organic HAP content data for the purpose of demonstrating compliance in accordance with §63.3360(c)
- volatile matter and coating solids content data for the purpose of demonstrating compliance with §63.3360(d)
- overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with §63.3360(e) and (f)
- material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with §63.3370(b), (c), and (d)
- records specified in §63.10(c) for each continuous monitoring system operated by the owner/operator in accordance with §63.3350(b)
- records of all liquid-liquid material balances performed in accordance with §63.3370.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 45: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

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

Item 45.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Process: CL1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 45.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

EMISSIONS FROM COATING LINE 1 WILL BE
CONTROLLED BY A THERMAL OXIDIZER WHICH
MEETS THE REQUIREMENTS OF 40 CFR PART 60,
SUBPART RR, AS EMISSIONS FROM EACH
PROCESS ARE TOTALLY ENCLOSED, COUPLED
WITH A 98% CONTROL EFFICIENCY OF THE
OXIDIZER.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

Reference Test Method: RM 25

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 46: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



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

Item 46.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Process: CL2

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 46.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

EMISSIONS FROM COATING LINE 2 WILL BE
CONTROLLED BY A THERMAL OXIDIZER WHICH
MEETS THE REQUIREMENTS OF 40 CFR PART 60,
SUBPART RR, AS EMISSIONS FROM EACH
PROCESS ARE TOTALLY ENCLOSED, COUPLED
WITH A 98% CONTROL EFFICIENCY OF THE
OXIDIZER.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

Reference Test Method: RM 25

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 47: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.742(a), NSPS Subpart VVV

Item 47.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Process: CL2

Regulated Contaminant(s):



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

CAS No: 0NY998-00-0 VOC

Item 47.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected facility that is subject to the requirements of this subpart shall comply with the emissions limitations set forth in this section on or after the date on which the initial performance test required by 40CFR Part 60.8 is completed, but not later than 60 days after achieving the maximum production rate at which the affected facility will be operated or 180 days after initial startup, whichever comes first

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2004.

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

Condition 48: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.742(b)(2), NSPS Subpart VVV

Item 48.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Process: CL2

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 48.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

EMISSIONS FROM THE VERTICAL TOWER COATER

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



WILL BE CONTROLLED BY A THERMAL OXIDIZER WHICH MEETS THE REQUIREMENTS OF 40 CFR PART 60 SUBPART VVV, AS EMISSIONS FROM EACH PROCESS ARE TOTALLY ENCLOSED, COUPLED WITH 98% CONTROL EFFICIENCY OF THE OXIDIZER.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Manufacturer Name/Model Number: Smith
Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1400 degrees Fahrenheit
Reference Test Method: Rm 25
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.747(d), NSPS Subpart VVV

Item 51.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG
Process: CL2

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

Item 51.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected facility demonstrating compliance by the methods described in 743(a)(1), (b) or (c) shall maintain records and submit quarterly reports to this Department documenting the following:

1) For those facilities monitoring thermal incinerator combustion gas temperature, all three hour periods (during actual coating operations) during which the



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

average combustion temperature of the device is more than 28 Celsius degrees below the average combustion temperature of the device during the most recent performance test that demonstrated compliance.

2) For each affected facility monitoring a total enclosure pursuant to 40 CFR part 60.744(h) or vapor capture system pursuant to 40 CFR Part 60.744(g), all three hour periods (during actual coating operations) during which the average total enclosure or vapor capture system monitor readings vary by 5 percent or more from the average value measured during the most recent performance test that demonstrate compliance.

3) Each owner or operator of an affected coating operation not required to submit reports under paragraphs number 1 and 2 of this condition because no reportable periods have occurred, shall submit semiannual statements clarifying this fact.

As required by 40 CFR Part 60.747 (g) and (h), all reports shall be postmarked within 30 days of the end of the reporting period and all records shall be kept for a minimum of two years.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 49: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

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

Item 49.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Process: CL3

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 49.2:

Compliance Demonstration shall include the following monitoring:



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

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

Monitoring Description:

EMISSIONS FROM THE PRESSURE SENSITIVE
ADHESIVE COATER WILL BE CONTROLLED BY A
THERMAL OXIDIZER WHICH MEETS THE
REQUIREMENTS OF 40 CFR PART 60, SUBPART
RR, AS EMISSIONS FROM EACH PROCESS ARE
TOTALLY ENCLOSED, COUPLED WITH A 98%
CONTROL EFFICIENCY OF THE OX

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

Reference Test Method: TBD

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 50: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

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

Item 50.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG

Process: CL4

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 50.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

EMISSIONS FROM COATING LINE 4 WILL BE
CONTROLLED BY A THERMAL OXIDIZER WHICH
MEETS THE REQUIREMENTS OF 40 CFR PART 60,
SUBPART RR, AS EMISSIONS FROM EACH
PROCESS ARE TOTALLY ENCLOSED, COUPLED
WITH A 98% CONTROL EFFICIENCY OF THE

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



OXIDIZER.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1400 degrees Fahrenheit
Reference Test Method: RM 25
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 52.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG Emission Point: 00001

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

Item 52.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IN ORDER TO CAP OUT OF THE REQUIREMENTS
OF 6 NYCRR PART 231 (NEW SOURCE REVIEW),
SGPPL WILL CAP EMISSIONS OF VOLATILE
ORGANIC COMPOUNDS (VOC) AT LESS THAN 36
TONS (72,000 POUNDS) PER 12 MONTH ROLLING
PERIOD. SGPPL WILL TRACK THE AMOUNT OF
PRODUCT USED AT THE FACILITY ON A MONTHLY
AND 12 MONTH ROLLING BASIS TO DEMONSTRATE
COMPLIANCE WITH IT'S CAP.

Monitoring Frequency: MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 53: Compliance Demonstration



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 53.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG Emission Point: 00001

Regulated Contaminant(s):

CAS No: 000108-88-3 TOLUENE

Item 53.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

TOTAL TOLUENE EMISSIONS FROM EMISSION
UNIT COATNG WILL BE LIMITED TO LESS THAN
9.5 TONS (19,000 POUNDS) DURING ALL
CONSECUTIVE TWELVE (12) MONTH PERIODS.

Manufacturer Name/Model Number: TO BE DETERMINED

Parameter Monitored: TOLUENE

Upper Permit Limit: 19000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 54: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 54.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG Emission Point: 00001

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Item 54.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

TOTAL HAZARDOUS AIR POLLUTANTS (HAP)
EMISSIONS FROM ALL OPERATIONS WILL BE
LIMITED TO LESS THAN TWENTY-FOUR (24)
TONS, (48,000 POUNDS) DURING ALL
CONSECUTIVE TWELVE (12) MONTH PERIODS.

Manufacturer Name/Model Number: TO BE DETERMINED

Parameter Monitored: HAP

Upper Permit Limit: 48000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 55: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-7.1

Item 55.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG Emission Point: 00001

Regulated Contaminant(s):

CAS No: 001330-20-7 XYLENE, M, O & P MIXT.

Item 55.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

TOTAL XYLENE EMISSIONS FROM EMISSION
UNIT COATNG WILL BE LIMITED TO LESS THAN
9.5 TONS (19,000 POUNDS) DURING ALL
CONSECUTIVE TWELVE (12) MONTH PERIODS.



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Manufacturer Name/Model Number: TO BE DETERMINED
Parameter Monitored: XYLENE, M, O & P MIXT.
Upper Permit Limit: 19000 pounds per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 56: control equipment other than VOC/solvent recovery
Effective between the dates of 02/13/2003 and Permit Expiration Date

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

Item 56.1:

This Condition applies to Emission Unit: C-OATNG Emission Point: 00001

Item 56.2:

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

Condition 57: Control requirement
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(f)

Item 57.1:

This Condition applies to Emission Unit: C-OATNG Emission Point: 00001

Item 57.2:

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

- (a) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography,
- (b) Method 25, Determination of Total Gaseous Nonmethane Organic Emissions as Carbon,
- (c) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

(d) Methods not listed above must be approved in advance by the commissioner's representative and the United States Environmental Protection Agency.

Condition 58: exhaust gas temperature
Effective between the dates of 02/13/2003 and Permit Expiration Date

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

Item 58.1:

This Condition applies to Emission Unit: C-OATNG Emission Point: 00001

Item 58.2:

Continuous monitors to measure the exhaust gas temperature of all incinerators shall be installed, periodically calibrated and operated at all times the incinerator is operating.

Condition 59: Handling, storage and disposal of volatile organic compounds
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 59.1:

This Condition applies to Emission Unit: C-OATNG Emission Point: 00001

Item 59.2:

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.

Condition 60: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(b)

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Item 60.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG Emission Point: 00001
Process: CL1

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

Item 60.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The afterburner shall be energy efficient and shall be designed and operated to provide, at a minimum, for an 80 percent overall removal efficiency of volatile organic compounds. The control equipment shall operate on minimal auxiliary fuel and provide for maximum heat recovery.

Stack emissions testing used to verify compliance with this limit and to determine the minimum afterburner temperature shall be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing shall be completed within 180 days after the permit issuance.

Pursuant to §228.5, the testing must use methods acceptable to the Department of Environmental Conservation. Methods 18, 25, or 25A from Appendix A of 40 CFR 60 must be used unless the department's representative and USEPA approve another method in advance. The test shall include provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of VOCs by the afterburner prior to release to the atmosphere.

Manufacturer Name/Model Number: Smith

Parameter Monitored: VOC

Lower Permit Limit: 80 percent reduction by weight

Upper Permit Limit: 98 percent reduction by weight

Reference Test Method: M18, 25 or 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: ARITHMETIC MEAN

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Reports due 30 days after the reporting period.
The initial report is due 7/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 61: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(b)

Item 61.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG Emission Point: 00001
Process: CL2

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

Item 61.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

The afterburner shall be energy efficient and shall be designed and operated to provide, at a minimum, for an 80 percent overall removal efficiency of volatile organic compounds. The control equipment shall operate on minimal auxiliary fuel and provide for maximum heat recovery.

Stack emissions testing used to verify compliance with this limit and to determine the minimum afterburner temperature shall be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing shall be completed within 180 days after the permit issuance.

Pursuant to §228.5, the testing must use methods acceptable to the Department of Environmental Conservation. Methods 18, 25, or 25A from Appendix A of 40 CFR 60 must be used unless the department's representative and USEPA approve another method in advance. The test shall include provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of VOCs by the afterburner prior to release to the atmosphere.



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

Manufacturer Name/Model Number: Smith
Parameter Monitored: VOC
Lower Permit Limit: 80 percent reduction by weight
Upper Permit Limit: 98 percent reduction by weight
Reference Test Method: M18, 25 or 25A
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: ARITHMETIC MEAN
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 62: Applicability and designation of affected facility.
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.740(b), NSPS Subpart VVV

Item 62.1:

This Condition applies to Emission Unit: C-OATNG Emission Point: 00001
Process: CL2

Item 62.2: Any affected facility for which the amount of VOC used is less than 95 Mg per 12-month period is subject only to the requirements of paragraphs 60.744(b), 60.747(b), and 60.747(c). If the amount of VOC used is 95 Mg or greater per 12-month period, the facility is subject to all the requirements of this subpart. Once a facility has become subject to the requirements of this subpart, it will remain subject to those requirements regardless of changes in annual VOC use.

Condition 63: Compliance Demonstration
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(b)

Item 63.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG Emission Point: 00001
Process: CL3

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

Item 63.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
The afterburner shall be energy efficient and shall be

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



designed and operated to provide, at a minimum, for an 80 percent overall removal efficiency of volatile organic compounds. The control equipment shall operate on minimal auxiliary fuel and provide for maximum heat recovery.

Stack emissions testing used to verify compliance with this limit and to determine the minimum afterburner temperature shall be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing shall be completed within 180 days after the permit issuance.

Pursuant to §228.5, the testing must use methods acceptable to the Department of Environmental Conservation. Methods 18, 25, or 25A from Appendix A of 40 CFR 60 must be used unless the department's representative and USEPA approve another method in advance. The test shall include provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of VOCs by the afterburner prior to release to the atmosphere.

Manufacturer Name/Model Number: Smith

Parameter Monitored: VOC

Lower Permit Limit: 80 percent reduction by weight

Upper Permit Limit: 98 percent reduction by weight

Reference Test Method: M18, 25 or 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: ARITHMETIC MEAN

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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

Condition 64: Compliance Demonstration

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(b)

Item 64.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-OATNG Emission Point: 00001

Process: CL4

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



CAS No: 0NY998-00-0 VOC

Item 64.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The afterburner shall be energy efficient and shall be designed and operated to provide, at a minimum, for an 80 percent overall removal efficiency of volatile organic compounds. The control equipment shall operate on minimal auxiliary fuel and provide for maximum heat recovery.

Stack emissions testing used to verify compliance with this limit and to determine the minimum afterburner temperature shall be conducted at least once per permit term or more frequently upon request of the regulatory agency. Testing shall be completed within 180 days after the permit issuance.

Pursuant to §228.5, the testing must use methods acceptable to the Department of Environmental Conservation. Methods 18, 25, or 25A from Appendix A of 40 CFR 60 must be used unless the department's representative and USEPA approve another method in advance. The test shall include provisions to determine both the efficiency of the capture system and of the subsequent destruction and/or removal of VOCs by the afterburner prior to release to the atmosphere.

Manufacturer Name/Model Number: Smith

Parameter Monitored: VOC

Lower Permit Limit: 80 percent reduction by weight

Upper Permit Limit: 98 percent reduction by weight

Reference Test Method: M18, 25 or 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: ARITHMETIC MEAN

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

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



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 65: Contaminant List

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 65.1:

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: HAP

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 0NY998-00-0

Name: VOC

CAS No: 001330-20-7

Name: XYLENE, M, O & P MIXT.

Condition 66: Unavoidable noncompliance and violations

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 66.1:

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

- (a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which



New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031

contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

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

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

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

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 67: Emission Unit Definition

Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 67.1:

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

Emission Unit: C-OATNG

Emission Unit Description:

EMISSION UNIT C-OATNG WILL CONSIST OF SEVERAL PROCESSES AND A THERMAL OXIDIZER ASSOCIATED WITH PRESSURE SENSITIVE ADHESIVE TAPES USED IN THE ELECTRONICS, GRAPHIC ARTS, AEROSPACE AND PACKAGING INDUSTRIES.

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



BULK ROLLS OF SUBSTRATE ARE COATED WITH SOLVENT-BASED PRIMERS THEN ADHESIVES ON POLYESTER FILM (70% SILICONE / 30% ACRYLIC) ON COATING LINE #4. COATING LINE #1 IS USED TO APPLY ADHESIVE COATINGS ON FOAM SUBSTRATES. A SOLVENT-BASED RELEASE AGENT IS APPLIED TO THE FILM AFTER THE ADHESIVE TO PREVENT THE TAPE FROM STICKING TO ITSELF. THE PROCESSING OF WOVEN GLASS AND OTHER COATED FABRICS WILL TAKE PLACE ON THE VERTICAL TOWER COATER. OPERATION OF THE PRESSURE SENSITIVE ADHESIVE (PSA) COATER IS SUCH THAT PRESSURE-SENSITIVE ADHESIVES ARE APPLIED TO A VARIETY OF SUBSTRATES, WHICH THEN PASSES THROUGH A DRYER. VOC AND HAP EMISSIONS FROM THESE COATING LINES WILL BE EXHAUSTED THROUGH A SMITH THERMAL INCINERATOR.

Building(s): LIBERTY

Condition 68: Air pollution prohibited
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 68.1:

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 69: Emission Point Definition By Emission Unit
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 69.1:

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

Emission Unit: C-OATNG

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Emission Point: 00001
Height (ft.): 60 Diameter (in.): 56
NYTMN (km.): 4751.333 NYTME (km.): 634.048 Building: LIBERTY

Condition 70: Process Definition By Emission Unit
Effective between the dates of 02/13/2003 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 70.1:

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

Emission Unit: C-OATNG
Process: CL1
Process Description:
FRANK W. EGAN & CO. ADHESIVE COATER WHICH
IS USED TO APPLY ADHESIVE COATINGS ON FOAM
SUBSTRATES. A SOLVENT-BASED RELEASE AGENT
IS APPLIED TO THE FILM AFTER THE ADHESIVE
TO PREVENT THE TAPE FROM STICKING TO
ITSELF.

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

Emission Source/Control: COAT1 - Process

Item 70.2:

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

Emission Unit: C-OATNG
Process: CL2
Process Description:
GLENRO, INC. VERTICAL TOWER COATER WHICH
WILL BE USED IN THE MANUFACTURING OF WOVEN
GLASS AND OTHER COATED FABRICS.

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

Emission Source/Control: VTTWR - Process

Item 70.3:

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

Emission Unit: C-OATNG

New York State Department of Environmental Conservation

Permit ID: 4-3828-00031/00023

Facility DEC ID: 4382800031



Process: CL3

Process Description:

WOLVERINE CORPORATION PRESSURE SENSITIVE ADHESIVE TAPE COATING LINE OPERATED SUCH THAT PRESSURE SENSITIVE ADHESIVES ARE APPLIED TO A VARIETY OF SUBSTRATES, WHICH THEN PASSES THROUGH A DRYER.

Emission Source/Control: SMITH - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: PSALN - Process

Item 70.4:

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

Emission Unit: C-OATNG

Process: CL4

Process Description:

MIDLAND ROSS CORP. COATER EQUIPPED WITH 3-ZONE FLOATER DRYER. BULK ROLLS OF SUBSTRATE ARE COATED WITH SOLVENT-BASED PRIMERS THEN ADHESIVES ON POLYMER FILM (70% SILICONE / 30% ACRYLIC).

Emission Source/Control: SMITH - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: COAT4 - Process