



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 5-0913-00110/00001
Mod 0 Effective Date: 07/19/2010 Expiration Date: No expiration date.
Mod 1 Effective Date: 11/17/2011 Expiration Date: No expiration date.

Permit Issued To: SOLVE COMPOSITES LLC
29 DISTRIBUTION WAY
IMPERIAL INDUSTRIAL PARK
PLATTSBURGH, NY 12901

Facility: SOLVE COMPOSITES LLC
29 DISTRIBUTION WAY | IMPERIAL INDUSTRIAL PARK
PLATTSBURGH, NY 12901

Contact: MARK LOWTHER
SOLVE COMPOSITES
29 DISTRIBUTION WAY
PLATTSBURGH, NY 12901
(518) 324-3838

Description:
Solve Composites, LLC operates a reinforced fiberglass composite facility which manufactures flat Fiberglass Reinforced Plastic (FRP) panels for the transportation industry. The manufacturing procedure will consist of both open contact and resin transfer molding (RTM). The facility is identified under SIC codes 3088/3089.

The facility is located on a 45.65 acre section at 29 Distribution Way in the City of Plattsburgh, New York. The site consists of a single manufacturing building with a number of small structures and garages. Solve Composites will occupy approximately 40,000 squared feet of the southwest corner of the building. The production building is approximately 275 feet long, 120 feet wide, at maximum, and 25 feet high. There is approximately 37,000 square feet of production area proposed for use by Solve Composites. The central area is the site of the gelcoat, open and closed molding (RTM) application, and curing activities. The remainder of the area consists of chemical and finished part storage, trimming, finishing, bonding, painting, assembly and packaging.

Facility-wide potential emissions of Styrene and Methyl methacrylate (speciated Hazardous Air Pollutants) and total HAPs are limited below major source



thresholds capping out of Title V operating permit and National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63, Subparts WWW (Reinforced Plastic Composites Production) and Subpart PPPP (Surface Coating of Plastic Parts and Products), applicability. Facility process emissions are regulated primarily under 6 NYCRR Parts 200, 212, and Subpart 228-2, General Provisions, General Process Emission Sources, and Commercial and Industrial Adhesive, Sealants and Primers respectively.

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: MICHAEL J MCMURRAY
 NYSDEC
 PO BOX 296
 RAY BROOK, NY 12977-0296

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of application for permit modification or renewal-REGION 5 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, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

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 transfer of ownership.



Condition 1-1: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-1.1:

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

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

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

Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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

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

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

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

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 5 Headquarters
Division of Environmental Permits
Route 86, PO Box 296
Ray Brook, NY 12977-0296
(518) 897-1234

New York State Department of Environmental Conservation

Permit ID: 5-0913-00110/00001

Facility DEC ID: 5091300110



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: SOLVE COMPOSITES LLC
29 DISTRIBUTION WAY
IMPERIAL INDUSTRIAL PARK
PLATTSBURGH, NY 12901

Facility: SOLVE COMPOSITES LLC
29 DISTRIBUTION WAY | IMPERIAL INDUSTRIAL PARK
PLATTSBURGH, NY 12901

Authorized Activity By Standard Industrial Classification Code:
3088 - PLASTICS PLUMBING FIXTURES
3089 - PLASTICS PRODUCTS, NEC

Mod 0 Permit Effective Date: 07/19/2010
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 11/17/2011
date.

Permit Expiration Date: No expiration



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 200.6: Compliance Demonstration
- 3 6 NYCRR 200.6: Compliance Demonstration
- 4 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *1-1 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *1-2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 6 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications
- 7 6 NYCRR 212.4 (c): Compliance Demonstration
- 8 6 NYCRR 212.6 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 9 ECL 19-0301: Contaminant List
- 10 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 11 6 NYCRR Subpart 201-5: Emission Unit Definition
- 12 6 NYCRR 201-5.4 (b): Compliance Demonstration
- 1-3 6 NYCRR 211.1: Air pollution prohibited
- 1-4 6 NYCRR 211.2: Visible Emissions Limited
- 1-6 6 NYCRR 228-2.3 (e) (2): Compliance Demonstration
- 1-7 6 NYCRR 228-2.3 (f) (1): Compliance Demonstration
- 1-8 6 NYCRR 228-2.3 (f) (3): Compliance Demonstration
- 1-5 6 NYCRR 228-2.5 (a): Compliance Demonstration
- 1-9 6 NYCRR 228-2.7 (b): Compliance Demonstration

Emission Unit Level

- 14 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 15 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=U-00001

- 1-10 6 NYCRR 228-2.3 (e) (1): Compliance Demonstration
- 1-11 6 NYCRR 228-2.3 (h): Required VOC controls for Industrial adhesive processes emitting 3 tons per year or more.
- 1-12 6 NYCRR 228-2.3 (i): No person shall solicit, require the use or specify the application of noncomplaint products.
- 1-13 6 NYCRR 228-2.5 (c): Maintain records for five years.

NOTE: * preceding the condition number indicates capping.



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 - 6 NYCRR 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 - 6 NYCRR 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 - 6 NYCRR 200.7

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



required to operate such device effectively.

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR 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 - 6 NYCRR 201-1.5

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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



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

Item F: Recycling and Salvage - 6 NYCRR 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 - 6 NYCRR 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 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 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 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 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 6 NYCRR Subpart 202-1.

- Item K: Open Fires Prohibitions - 6 NYCRR 215.2**
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.
- Item L: Permit Exclusion - ECL 19-0305**
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.
- Item M: Federally Enforceable Requirements - 40 CFR 70.6 (b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Acceptable Ambient Air Quality



Effective between the dates of 07/19/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

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

Condition 2: Compliance Demonstration

Effective between the dates of 07/19/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 200.6

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The source owner or operator shall maintain manufacturer's documentation demonstrating non-atomized spray guns, as permitted under various processes, result in HAP emissions that are no greater than the emissions predicted by the non-atomized application equations used to determine PTEs and actual emissions for capping purposes.

The non-atomized spray guns shall be operated in accordance with the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: Compliance Demonstration

Effective between the dates of 07/19/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 200.6

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 3.2:



Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The source owner or operator shall comply with the following work practices:

1. For cleaning operations, the permittee shall not use cleaning solvents that contain HAP, except that styrene containing material may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement.
2. For VOC & HAP-containing material storage operations, the permittee shall keep containers that store VOC & HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. However, these vents may be subject to additional applicable requirements.
3. For the mixing operation, the permittee shall use mixer covers with no visible gaps present in the mixers covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. The permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
4. The permittee shall also keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
5. Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin).
6. Minimize spills during the handling and transfer of coatings and solvents.
7. Doors & windows shall remain closed to ensure that emissions are captured and exhausted through the stacks with adequate dispersion.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Condition 4: Facility Permissible Emissions
Effective between the dates of 07/19/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 4.1:

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:

per year CAS No: 000080-62-6 (From Mod 1) PTE: 18,000 pounds

Name: METHYL ACRYLIC ACIDMETHYL ESTER

per year CAS No: 0NY100-00-0 (From Mod 1) PTE: 48,000 pounds

Name: HAP

Condition 1-1: Capping Monitoring Condition
Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Replaces Condition(s) 5

Item 1-1.1:

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

6 NYCRR 201-6.1 (a)

40 CFR 63.4481 (b)

40 CFR 63.5785

Item 1-1.2:

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

Item 1-1.3:

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

Item 1-1.4:

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



applicable requirement.

Item 1-1.5:

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

Item 1-1.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000080-62-6 METHYL ACRYLIC ACIDMETHYL ESTER

Item 1-1.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility-wide emissions for the speciated Hazardous Air Pollutant(s) (HAPs) listed above is limited to no more than 9 tons (18,000 pounds) for any consecutive 12 month period. This caps the facility below major source thresholds for these contaminants. All other speciated HAPs contained in the permit application were reviewed at the reported potentials to emit (PTE) and require no additional limits based on these emission rates.

Source owner or operator shall maintain a written record of the HAP's (speciated and combined) emitted monthly, as well as each consecutive twelve (12) month total. Emissions from all sources emitting HAP, including those that are not subject to permitting requirements shall be incorporated into these totals.

In addition, the owner or operator shall maintain records of all data, assumptions, and calculations used to determine HAP factors and emissions, including the following:

- A brief description of the rationale for the assignment of an equation or factor to each formula.
- The identification and usage of VOC and HAP containing reactants, coatings, solvents, adhesives, and etc.
- VOC and (speciated and combined) HAP concentrations for all raw materials used. The owner or operator may rely on information provided by the manufacturer, such as manufacturer's formula data and material safety data sheets (MSDS).

New York State Department of Environmental Conservation

Permit ID: 5-0913-00110/00001

Facility DEC ID: 5091300110



All records required to document compliance with the facility-wide HAP emissions caps shall be maintained on-site for a period of at least five (5) years and made available to NYSDEC and/or USEPA representatives upon request.

Parameter Monitored: SPECIATED HAP (MASS)
Upper Permit Limit: 9 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-month total, rolled monthly
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2012.
Subsequent reports are due every 12 calendar month(s).

Condition 1-2: Capping Monitoring Condition
Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 1-2.1:

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

6 NYCRR 201-6.1 (a)
40 CFR 63.4481 (b)
40 CFR 63.5785

Item 1-2.2:

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

Item 1-2.3:

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

Item 1-2.4:

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

Item 1-2.5:

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



the Act.

Item 1-2.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility-wide emissions for total Hazardous Air Pollutants (HAPs) are limited to no more than 24 tons (48,000 pounds) for any consecutive 12 month period. This limit caps the facility below major source thresholds.

Source owner or operator shall maintain a written record of the HAP's (speciated and total) emitted monthly, as well as each consecutive twelve (12) month total. Emissions from all sources emitting HAP, including those that are not subject to permitting requirements shall be incorporated into these totals.

In addition, the owner or operator shall maintain records of all data, assumptions, and calculations used to determine HAP factors and emissions, including the following:

- A brief description of the rationale for the assignment of an equation or factor to each formula.
- The identification and usage of VOC and HAP containing reactants, coatings, solvents, adhesives, and etc.
- VOC and (speciated and combined) HAP concentrations for all raw materials used. The owner or operator may rely on information provided by the manufacturer, such as manufacturer's formula data and material safety data sheets (MSDS).

All records required to document compliance with the facility-wide HAP emissions caps shall be maintained on-site for a period of at least five (5) years and made available to NYSDEC and/or USEPA representatives upon request.

Parameter Monitored: HAP
Upper Permit Limit: 24 tons per year
Monitoring Frequency: MONTHLY

New York State Department of Environmental Conservation

Permit ID: 5-0913-00110/00001

Facility DEC ID: 5091300110



Averaging Method: 12-month total, rolled monthly
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2012.
Subsequent reports are due every 12 calendar month(s).

**Condition 6: Emissions from new emission sources and/or modifications
Effective between the dates of 07/19/2010 and Permit Expiration Date**

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 6.1:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

**Condition 7: Compliance Demonstration
Effective between the dates of 07/19/2010 and Permit Expiration Date**

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted by the facility at the request of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 8: Compliance Demonstration
Effective between the dates of 07/19/2010 and Permit Expiration Date**

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 8.1:

New York State Department of Environmental Conservation

Permit ID: 5-0913-00110/00001

Facility DEC ID: 5091300110



The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



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 - 6 NYCRR 201-1.10 (a)

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 9: Contaminant List

Effective between the dates of 07/19/2010 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 9.1:

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

CAS No: 000080-62-6

Name: METHYL ACRYLIC ACIDMETHYL ESTER

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: HAP

Condition 10: Unavoidable noncompliance and violations

Effective between the dates of 07/19/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 10.1:

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

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective

New York State Department of Environmental Conservation

Permit ID: 5-0913-00110/00001

Facility DEC ID: 5091300110



action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superseded 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 11: Emission Unit Definition
Effective between the dates of 07/19/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 11.1(From Mod 1):

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

Emission Unit: U-00001

Emission Unit Description:

Composite fiberglass reinforced plastic manufacturing of flat panels for the transportation industry.

Building(s): Bld001

Condition 12: Compliance Demonstration
Effective between the dates of 07/19/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-5.4 (b)

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

1 Certain changes and modifications (such as changes in raw materials or processes) which meet the criteria under subparagraphs (i - iii) of this paragraph may be conducted



without prior approval of the department and shall not require modification of the permit. The facility owner or operator must maintain records of the date and description of such changes and make such records available for review by the department's representative upon request.

- i) Changes that do not cause emissions to exceed any emission limitation contained in regulations or applicable requirements under this Title (e.g., control requirements specified in 6NYCRR 212.4(a), Table 2, and as determined in accordance with the Department's DAR-1 policy, and etc.).
- ii) Changes which do not cause the source to become subject to any additional regulations or requirements under this Title (e.g., control requirements specified in 6NYCRR 212.4(a), Table 2, and as determined in accordance with the Department's DAR-1 policy, 6 NYCRR Part 228, and 40 CFR 63, Subpart WWWW and etc.).
- iii) Changes which do not seek to establish or modify a federally enforceable emission cap or limit.

2) In addition to record keeping requirements under paragraph (1) of this subdivision, the permittee must notify the department in writing at least 30 calendar days in advance of making changes involving:

- a) the relocation of emission points within a facility;
- b) the emission of any air pollutant not previously authorized or remitted in accordance with a permit issued by the department;
- c) the installation or alteration of any air cleaning installations, device or control equipment.

3) The department may require a permit modification to impose applicable requirements or special conditions if it determines that changes proposed pursuant to notification under paragraph (2) of this subdivision do not meet the criteria under paragraph (1) of this subdivision or change may have a significant air quality impact. In such cases the department may require that the permittee not undertake the proposed change until it completes a more



detail review of the change for air quality impacts and/or applicable requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-3: Air pollution prohibited
Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.1

Item 1-3.1:

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

Condition 1-4: Visible Emissions Limited
Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 1-4.1:

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

Condition 1-6: Compliance Demonstration
Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 228-2.3 (e) (2)

Item 1-6.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The VOC content limits in table 1 of this section for adhesives applied to particular substrates shall apply as follows:

- if an adhesive is used to bond dissimilar substrates together, the applicable substrate category with the highest VOC content shall be the limit for such use.



Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-7: Compliance Demonstration
Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 228-2.3 (f) (1)

Item 1-7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any person using a surface preparation solvent shall:

(1) except as provided in paragraph (2) of this subdivision for single-ply roofing, limit the VOC content of surface preparation solvent used to less than 70 grams per liter.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-8: Compliance Demonstration
Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 228-2.3 (f) (3)

Item 1-8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any person using a cleanup solvent shall:

Except as provided in paragraph (4) of this subdivision, limit the composite vapor pressure of a cleanup solvent to



less than 45 mm Hg at 20°C.

(4) perform the removal of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment as follows:

(i) in an enclosed cleaning system, or equivalent cleaning system as determined by the test method identified in section 228-2.6(h) of this Subpart;

(ii) using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material; and

(iii) parts containing dried adhesive may be soaked in a solvent if the composite vapor pressure of the solvent, excluding water and exempt compounds, is less than or equal to 9.5 mm Hg at 20°C and the parts and solvent are in a closed container that remains closed except when adding parts to or removing parts from the container.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-5: Compliance Demonstration
Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement: 6 NYCRR 228-2.5 (a)

Item 1-5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an emissions unit where a product subject to a VOC content limit in section 228-2.3 of this Subpart is used, shall maintain records demonstrating compliance with the VOC content limits of this Subpart, including, but not limited to, the following information:

(1) a list of each commercial and industrial adhesive,



sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at the emissions unit;

(2) identification of each product by product name and description;

(3) the VOC content of each product as supplied;

(4) the mix ratio of any catalysts, reducers or other components used;

(5) the final VOC content or vapor pressure, as applied; and

(6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used at the emissions unit.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-9: Compliance Demonstration

Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 228-2.7 (b)

Item 1-9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

228-2.7(b) -The VOC content of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer shall be calculated using the manufacturer's formulation data or determined using the calculations, procedures and test methods in section 228-2.6 of this Subpart.

228-2.7(c) - Any person applying a commercial or industrial adhesive, sealant, adhesive primer or sealant primer subject to a VOC content limit in table 1 of section 228-2.3 of this Subpart may rely on the manufacturer's representation on the container or label, if such product is applied as recommended for a use specified on the container or label.



Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**** Emission Unit Level ****

Condition 14: Emission Point Definition By Emission Unit
Effective between the dates of 07/19/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 14.1(From Mod 1):

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

Emission Unit: U-00001

Emission Point: EF-01
Height (ft.): 40 Diameter (in.): 40
NYTMN (km.): 4948.53 NYTME (km.): 621.22 Building: Bld001

Emission Point: EF-02
Height (ft.): 40 Diameter (in.): 32
NYTMN (km.): 4948.53 NYTME (km.): 621.22 Building: Bld001

Emission Point: EF-03
Height (ft.): 40 Diameter (in.): 32
NYTMN (km.): 4948.53 NYTME (km.): 621.22 Building: Bld001

Emission Point: EF-B1
Height (ft.): 40 Diameter (in.): 34
NYTMN (km.): 4948.53 NYTME (km.): 621.22 Building: Bld001

Emission Point: EF-G1
Height (ft.): 40 Diameter (in.): 42
NYTMN (km.): 4948.53 NYTME (km.): 621.22 Building: Bld001

Emission Point: EFPR1
Height (ft.): 40 Diameter (in.): 34
NYTMN (km.): 4948.53 NYTME (km.): 621.11 Building: Bld001

Condition 15: Process Definition By Emission Unit
Effective between the dates of 07/19/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 15.1(From Mod 1):

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

Emission Unit: U-00001



Process: P01 Source Classification Code: 3-08-007-22

Process Description:

Styrene-based gelcoat material (stored in exempt containers) will be applied to the surface of the mold via non-atomized spray layup techniques in the gelcoat application enclosure. The enclosure contains two (2) gelcoat application stations (ESs GC001 & 002). Filters (ES GFLT1) in the gelcoat application enclosure ensures particulate is controlled. After the gelcoat is applied, the coated molds will be removed from the enclosure. The coated molds destined for the closed molding activity will be transferred to the gelcoat cure area (ES GCCUR). The coated molds destined for the open molding activity will be moved to the open contact molding area (ES OAREA). This gelcoat application enclosure is approximately 26.5 feet long and 14 feet wide and is exhausted by a 16,000 cfm fan, designated as emission point EF-G1. The open contact molding area and gelcoat curing area will be ventilated by an exhaust fans, designated as emission points EF-01 & 02, respectively. Doors and windows will remain closed to ensure emissions are captured and exhausted through the stack.

Emission Source/Control: GFLT1 - Control
Control Type: POLYESTER FILTER

Emission Source/Control: GC001 - Process

Emission Source/Control: GC002 - Process

Emission Source/Control: GCCUR - Process

Emission Source/Control: OAREA - Process

Item 15.2(From Mod 1):

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

Emission Unit: U-00001

Process: P02 Source Classification Code: 3-08-007-23

Process Description:

In the open molding operation, a "barrier" or "skin" coat of filled resin may be applied via non-atomized methods to the gelcoated surface. Following the skin coat, a mixture of filled styrene-based resin and glass mat, precut to the proper size, will then be applied via non-atomized methods to the surface. Hand rollers are used to force resin into the chop after sufficient layers of resin coated glass mat are applied to the mold. Four to six application stations (ES OAREA) will be in use at one time, depending on the size of the part being laminated. The resin infused material is allowed to polymerize and harden in the molding area for approximately 8 hours. The open molding



lamination/curing area will be ventilated by an exhaust fan, designated as emission point EF-01. Doors and windows will remain closed to ensure emissions are captured and exhausted through the stack.

Emission Source/Control: OAREA - Process

Item 15.3(From Mod 1):

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

Emission Unit: U-00001

Process: P03

Source Classification Code: 3-08-007-02

Process Description:

When fully solidified, both RTM and open molding process molds are moved to the demolding area where the part is removed from the mold. The mold will then be returned to the mold preparation area (ES MPREP) where it is inspected. The mold may require minor cleaning ("mold care") or repair, using a tooling resin or tooling gelcoat. A mold release agent may be applied to facilitate removal of the next part from the mold. When the mold is prepped and ready, it is returned to the gelcoat booth to begin the process again. The demolding area is exhausted by fan designated as emission point EF-03.

After the part is removed from the mold, the unfinished edges, also known as flashings, are trimmed by hand using air powered tools in the trimming area of the building (trivial activity no. 52, effective 10/24/04). The trimmed material will be discarded as non-hazardous waste. The trimming operations results in pieces, fragments, and particles to large to become airborne, as well as some smaller dusts which could result in fugitive emissions. Grinding and repair of surface imperfections is also performed by hand tools in this area. The grinding and cutting dust are controlled by several Donaldson/Torrit dust collectors which vent the air back into the building.

Emission Source/Control: MPREP - Process

Item 15.4(From Mod 1):

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

Emission Unit: U-00001

Process: P04

Source Classification Code: 3-08-007-04

Process Description:

Prior to this bonding process, some panels may first be moved to the paint room where texture and/or anti-graffiti coating will be applied to the surface using an HVLP paint



spray gun and controlling emissions with a filter. Emissions generated by this activity are exhausted by a fan designated as emission point EF-PR1.

When the part is dry, the coated panels will join the uncoated panels in the Bonding Room (ES BOND1), where solvent based adhesives, applied by brush or low pressure applicator at a single station, are used to bond metal brackets and rubber gaskets to the part. HAP and VOC species generated by this activity are exhausted by an fan, designated as emission point EF-B1.

The bonded panels will then be moved to the pre-assembly and finishing area where holes and slots are cut into the panels as required, and the panels receive a final polishing and buffing (trivial activity NYCRR 201-3.3(c)(52), effective 10/24/04) using an aqueous material (Aqua Buff 2000). The part will then be moved to the storage area for final inspection and preparation for shipping. No particulates exit the building from these activities.

Emission Source/Control: BOND1 - Process

Item 15.5(From Mod 1):

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

Emission Unit: U-00001

Process: P06

Process Description:

Production resins are transferred by hand from covered storage containers/tanks to up to five (5) covered mixing tanks (ES MXTKS) in the dispensing area. The mixing vessels will be covered except when material is being added or mixture removed. The mixed resin will then be transferred by hand from the mixing vessels to the point of use.

Emission Source/Control: MXTKS - Process

Design Capacity: 200 liters

Item 15.6(From Mod 1):

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

Emission Unit: U-00001

Process: PO5

Process Description:

In the RTM process, the partially cured gelcoat mold is covered with fiberglass mat, which has been pre-cut to proper dimensions, in the Fiber Layup area (ES LAYUP). This Fiber Layup area is vented by an exhaust fan



designated as emission point EF-03. A second counter mold is placed over the previously gelcoated mold holding the glass and the two are locked together. The counter mold may also be gelcoated. The filled resin, delivered from the mixing station, is then pumped into the spacing between the two molds, filling the void space between the mat glass. A vacuum pump is then used to seal the flanges of the closed mold and to assist the transfer of filled resin into the mold cavity and remove air bubbles. When the cavity is filled, as evidenced by the appearance of resin in the vacuum line, the pumping is halted, the lines sealed and the part is allowed to cure (ES RMINJ) .

Emission Source/Control: LAYUP - Process

Emission Source/Control: RMINJ - Process

Item 15.7(From Mod 1):

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

Emission Unit: U-00001

Process: PO7

Process Description:

In the paint booth, parts are textured and anti-graffiti coating may be applied. For the texturizing, gelcoat is applied to the parts/panels by an HVLP spray gun (ES HVLP1) to create a texture on the surface of the parts. In addition to the texturizing, anti-graffiti coating may be applied to parts using an HVLP spray gun (ES HVLP4). When the parts are dry, they are moved from the booth to the assembly area/bonding room. Emissions from the paint booth are controlled by a filter (ES PAINT) and the exhaust is vented by fan to a stack (EP EFPR1).

Emission Source/Control: PAINT - Control
Control Type: POLYESTER FILTER

Emission Source/Control: HVLP1 - Process
Design Capacity: 48 grams per minute

Emission Source/Control: HVLP4 - Process
Design Capacity: 40 grams per minute

Condition 1-10: Compliance Demonstration

Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 228-2.3 (e) (1)

Item 1-10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001



Item 1-10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The VOC content limits in Table 1 of section 228-2.3, are for adhesives applied to particular substrates. If an operator uses a commercial or industrial adhesive or sealant subject to a specific VOC content limit for such adhesive or sealant in Table 1, such specific limit is applicable rather than an adhesive-to-substrate limit.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-11: Required VOC controls for Industrial adhesive processes emitting 3 tons per year or more.

Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 228-2.3 (h)

Item 1-11.1:

This Condition applies to Emission Unit: U-00001

Item 1-11.2:

VOC control approaches shall be employed at facilities where the total actual VOC emissions from all industrial adhesive application processes, including related cleaning activities, equal or exceed 2,721 Kilograms (three tons) in a twelve month rolling period, before consideration of controls. These controls shall include:

(1) The following types of application equipment, with the use of low-VOC adhesives or adhesive primers: electrostatic spray; HVLP spray; flow coat; roll coat or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application; dip coat (including electrodeposition); airless spray; air-assisted airless spray; any other adhesive application method, subject to Department approval, capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spraying;

(2) The following work practices for storage, mixing operations, and handling operations for adhesives, thinners, and adhesive-related waste materials that:

(i) store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers;

(ii) ensure that mixing and storage containers used for VOC-containing adhesives, adhesive primers, and process related waste materials are



kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing adhesives, adhesive primers, and process related waste materials; and

(iv) convey VOC-containing adhesives, adhesive primers, and process related waste materials from one location to another in closed containers or pipes.

(3) The following work practices to reduce VOC emissions from cleaning materials used in industrial adhesive application processes that:

(i) store all VOC-containing cleaning materials and used shop towels in closed containers;

(ii) ensure that storage containers used for VOC-containing materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing cleaning materials;

(iv) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

(v) minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Condition 1-12: No person shall solicit, require the use or specify the application of noncomplaint products.

Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 228-2.3 (i)

Item 1-12.1:

This Condition applies to Emission Unit: U-00001

Item 1-12.2:

No person shall solicit, require the use or specify the application of any adhesive, sealant, adhesive primer, sealant primer, surface preparation or clean-up solvent if such use or application results in a violation of Subpart 228-2. The prohibition shall apply to all written or oral contracts under which any adhesive, sealant, adhesive primer, sealant primer, surface preparation or clean-up solvent is to be used at any location in the State of New York.

New York State Department of Environmental Conservation

Permit ID: 5-0913-00110/00001

Facility DEC ID: 5091300110



Condition 1-13: Maintain records for five years.

Effective between the dates of 11/17/2011 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 228-2.5 (c)

Item 1-13.1:

This Condition applies to Emission Unit: U-00001

Item 1-13.2:

All records made to determine compliance with Subpart 228-2 shall be maintained for five years from the date such record is created and shall be made available to the Department within 90 days of a request.

