



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 5-0913-00110/00002
Effective Date:

Expiration Date:

Permit Issued To: BFG INTERNATIONAL USA, LLC
29 DISTRIBUTION WAY
IMPERIAL INDUSTRIAL PARK
PLATTSBURGH, NY 12901

Facility: BFG INTERNATIONAL USA, INC
29 DISTRIBUTION WAY | IMPERIAL INDUSTRIAL PARK
PLATTSBURGH, NY 12901

Contact: ALISA LANGILLE
BFG INTERNATIONAL USA LLC
29 DISTRIBUTION WAY
PLATTSBURGH, NY 12901
(518) 324-3838

Description:

BFG manufactures reinforced plastic composite parts and subassemblies predominantly used in the transportation and recreation industry. The Standard Industrial Classification Code (SIC code) for this facility is 3089 - Plastic Products, Not Elsewhere Classified and the corresponding NAICS code is 326199 - All Other Plastics Products Manufacturing. The primary methods of manufacture consist of gel coating molds, open and closed molding (i.e., resin transfer molding- RTM), and surface coating. These processes are conducted within the building in designated application booths and areas.

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. BFG International occupies approximately 40,000 square feet of the southwest corner of the building. The central area is the site of the gel coat, open molding, RTM and curing activities. The remainder of the area consists of chemical and finished part storage, trimming, finishing, bonding, painting, assembly, packaging, and maintenance activities. Facility emissions from these processes and activities consist of particulates, hazardous air pollutants (HAPs), and volatile organic compounds (VOCs). Particulate emissions are controlled by particulate filters at each exhaust stack. Emissions of volatile HAPs and VOCs from the facility are controlled by material limitations and operational techniques.



Up to this point, BFG has operated under an Air State Facility Permit with federally enforceable caps limiting facility VOC and Hazardous Air Pollutant (HAP) emissions below major source thresholds to avoid the requirements of:

- 6 NYCRR 201-6: Title V Permits;
- 40CFR63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production;
- 40 CFR 63, Subpart PPPP: NESHAP for Surface Coating of Plastic Parts;
- 6 NYCRR 212.10: Reasonably Available Control Technology for major facilities; and
- 6 NYCRR Subpart 231-5: New Major Facilities And Modifications To Existing Non-Major Facilities In Nonattainment Areas, and Attainment Areas of the State within the Ozone Transport Region.

The facility has recently become major for HAPs, therefore the caps on HAPs no longer provide the facility an exception from Title V permitting and NESHAP requirements. This initial Title V permit removes the obsolete caps on HAPs and identifies NESHAP and Title V permit requirements now applicable to this facility. A VOC cap of 47.5 tons per year has been added to this permit in order to maintain exception from Section 212.10 and Subpart 231-5 requirements listed above.

The facility's one permitted emission unit contains all operations, consisting of 7 different processes. In general, the processes include manufacturing with styrene and methyl methacrylate resin materials applied by spray equipment, by hand, and by resin transfer molding (RTM). Processes also include mold preparation, grinding, trimming, drilling, surface coating, bonding and other related processes. This emission unit consists of six emission points, labeled EF-01, EF-02, EF-03, EF-B1, EF-G1 and EFPR1. There are also several fugitive emission areas. Facility process emissions are also regulated under 6 NYCRR Parts 200, 212, and Subparts 228-1 & 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

New York State Department of Environmental Conservation
Facility DEC ID: 5091300110



compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: ERIN L BURNS
NYSDEC - REGION 5
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

Facility Level

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



DEC GENERAL CONDITIONS

**** General Provisions ****

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.3:

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

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

Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or



revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

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

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

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

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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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Facility: BFG INTERNATIONAL USA, INC
29 DISTRIBUTION WAY | IMPERIAL INDUSTRIAL PARK
PLATTSBURGH, NY 12901

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

Permit Effective Date:

Permit Expiration Date:



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
 - 2 6 NYCRR 201-6.4 (a) (7): Fees
 - 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
 - 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
 - 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
 - 6 6 NYCRR 201-6.4 (e): Compliance Certification
 - 7 6 NYCRR 202-2.1: Compliance Certification
 - 8 6 NYCRR 202-2.5: Recordkeeping requirements
 - 9 6 NYCRR 215.2: Open Fires - Prohibitions
 - 10 6 NYCRR 200.7: Maintenance of Equipment
 - 11 6 NYCRR 201-1.7: Recycling and Salvage
 - 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
 - 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
 - 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
 - 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
 - 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
 - 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
 - 18 6 NYCRR 202-1.1: Required Emissions Tests
 - 19 40 CFR Part 68: Accidental release provisions.
 - 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
 - 21 6 NYCRR Subpart 201-6: Emission Unit Definition
 - 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
 - 23 6 NYCRR Subpart 201-7: Facility Permissible Emissions
 - *24 6 NYCRR Subpart 201-7: Capping Monitoring Condition
 - 25 6 NYCRR 211.1: Air pollution prohibited
 - 26 6 NYCRR 212-1.3: Compliance Certification
 - 27 6 NYCRR 212-1.3: Compliance Certification
 - 28 6 NYCRR 212-1.3: Compliance Certification
 - 29 6 NYCRR 212-1.6 (a): Compliance Certification
 - 30 6 NYCRR 212-2.4 (b): Compliance Certification
 - 31 6 NYCRR 228-1.3 (a): Compliance Certification
 - 32 6 NYCRR 228-1.3 (d): Compliance Certification
 - 33 6 NYCRR 228-1.4 (b) (5): Compliance Certification
 - 34 6 NYCRR 228-1.4 (b) (6): Compliance Certification
 - 35 6 NYCRR 228-2.4 (a): Compliance Certification
 - 36 40CFR 63.4501, Subpart PPPP: General Provisions
 - 37 40CFR 63.4520(a), Subpart PPPP: Compliance Certification
 - 38 40CFR 63.4530(a), Subpart PPPP: Compliance Certification
 - 39 40CFR 63.5905, Subpart WWWW: Compliance Certification
 - 40 40CFR 63.5910(a), Subpart WWWW: Compliance Certification
 - 41 40CFR 63.5915, Subpart WWWW: Compliance Certification
- Emission Unit Level**
- 42 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit



43 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=U-00001

- 44 6 NYCRR 212-1.5 (f): Compliance Certification
- 45 6 NYCRR 228-2.4 (d): Compliance Certification
- 46 6 NYCRR 228-2.5 (c): Compliance Certification
- 47 40CFR 63.4490(a)(1), Subpart PPPP: Compliance Certification

EU=U-00001

- 48 40CFR 63.4531, Subpart PPPP: Maintenance of records
- 49 40CFR 63.4552, Subpart PPPP: Compliance Certification
- 50 40CFR 63.5810(c), Subpart WWWW: Compliance Certification
- 51 40CFR 63.5895(c), Subpart WWWW: Compliance Certification

EU=U-00001

- 52 40CFR 63.5900, Subpart WWWW: 5900(a)(4) - Continuous compliance with work practice standards
- 53 40CFR 63.5900, Subpart WWWW: Compliance Certification

EU=U-00001

- 54 40CFR 63.5925, Subpart WWWW: General provisions

EU=U-00001,Proc=P04

- 55 6 NYCRR 228-2.5 (a): Compliance Certification
- 56 6 NYCRR 228-2.7 (b): Compliance Certification
- 57 6 NYCRR 228-1.3 (b) (1): Compliance Certification
- 58 6 NYCRR 228-1.6 (a): Compliance Certification
- 59 6 NYCRR 228-1.6 (h): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 60 ECL 19-0301: Contaminant List
- 61 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 62 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 63 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 64 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 65 6 NYCRR 212-2.3 (b): Compliance Demonstration
- 66 6 NYCRR 212-2.3 (b): Compliance Demonstration
- 67 6 NYCRR 228-2.4 (b): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

- Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)**
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.
- Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (a) (4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and



reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

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

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

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

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

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

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

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



facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

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

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

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

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

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

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

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

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

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



a shorter time period in the case of an emergency.

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

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

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

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

**Condition 1: Acceptable Ambient Air Quality
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 200.6

Item 1.1:

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



emission control required.

Condition 2: Fees
Effective for entire length of Permit

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

Item 2.1:

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

Condition 3: Recordkeeping and Reporting of Compliance Monitoring
Effective for entire length of Permit

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

Item 3.1:

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

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

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

Condition 4: Records of Monitoring, Sampling, and Measurement
Effective for entire length of Permit

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

Item 4.1:

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



Condition 5: Compliance Certification
Effective for entire length of Permit

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring



report required above.

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

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate



whether or not the Department or EPA has approved the results.

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 6: Compliance Certification
Effective for entire length of Permit**

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

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

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

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

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

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
Region 5 Suboffice
232 Golf Course Road
Warrensburg, NY 12885-1172

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway



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Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

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

Condition 8: Recordkeeping requirements
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

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

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

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

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

Condition 9: Open Fires - Prohibitions
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 215.2



Item 9.1:

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

Item 9.2

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

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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



The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

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

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility
Effective for entire length of Permit

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

Item 13.1:

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

Condition 14: Trivial Sources - Proof of Eligibility



Effective for entire length of Permit

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

Item 14.1:

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

Condition 15: Requirement to Provide Information
Effective for entire length of Permit

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

Item 15.1:

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

Condition 16: Right to Inspect
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 16.1:

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

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Off Permit Changes
Effective for entire length of Permit



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

Item 17.1:

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

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

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

**Condition 18: Required Emissions Tests
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 18.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

**Condition 19: Accidental release provisions.
Effective for entire length of Permit**

Applicable Federal Requirement:40 CFR Part 68

Item 19.1:

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

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:



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

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

**Condition 23: Facility Permissible Emissions
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 23.1:

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

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

CAS No: 0NY998-00-0
Name: VOC

PTE: 95,000 pounds per year

**Condition 24: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 24.1:

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 212-3.1 (a)
6 NYCRR Subpart 231-5

Item 24.2:

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

Item 24.3:

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 24.4:

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.



information necessary to demonstrate manufacturer's control claims.

Materials used in processes will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing VOC emissions from all processes. All records required to document compliance with the facility-wide VOC 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.

As specified below, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the cap. The certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels.

Parameter Monitored: VOC's

Upper Permit Limit: 47.5 tons

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 25: Air pollution prohibited
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 211.1

Item 25.1:

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

**Condition 26: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 212-1.3

Item 26.1:

The Compliance Certification activity will be performed for the Facility.



Applicable Federal Requirement:6 NYCRR 212-1.3

Item 27.1:

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

Emission Unit: U-00001
Process: P01

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The source owner or operator shall maintain manufacturer's documentation of instructions specific to proper operation and maintenance of non-atomized gel coat spray guns. Source owner or operator shall use only non-atomized spray gun application techniques in permitted gel coat process PR 01. Emissions must be no greater than emissions estimated by the non-atomized application equations used to determine ERPs and PTEs.

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: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 28: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 212-1.3

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000100-42-5 STYRENE

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:



In accordance with the applicability requirements of Section 212-1.1 of this Part, the department will assign an environmental rating for each air contaminant emitted from each process emission source or emission point in accordance with Subdivisions (a) through (e) of this Section. The factors in Subdivisions (a) through (d) will be considered in making a determination of the environmental rating to be applied to an air contaminant pursuant to subdivision (e), Table 1 - Environmental Rating Criteria.

Based on NYSDEC's short-term and annual guideline concentrations (SGC and AGC, respectively), the maximum and short-term and annual ambient concentrations of styrene are predicted to be below concentrations that could cause acute and chronic health effects. However due to styrene's low odor threshold and high vapor pressure, these emissions can be associated with local nuisances which are a consideration in determining the environmental rating in accordance with Environmental Rating Criteria in subdivision (e), Table 1.

Prior to this title V permit the facility's Potential to Emit (PTE) for styrene was 9 tons per year (tpy), due to an emissions cap. Based on past operating performance at this emission rate, the styrene emissions from this facility have not been documented to cause a nuisance in accordance with 6 NYCRR 211.1. Until compliance with 211.1 is substantiated otherwise, the owner or operator shall not exceed an annual mass emission rate (MER) of 9 tpy of styrene for which an environmental rating of "B" is assigned.

The owner or operator shall calculate styrene emissions on a monthly basis in order to verify the 12-month total emissions remain below the specified annual mass emission limit. If, styrene odors are documented to be a nuisance in accordance with 211.1, the permit will be modified to reflect a re-rating of the Environmental Rating for styrene.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RESIN
Parameter Monitored: STYRENE
Upper Permit Limit: 9 tons
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).



Condition 29: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 29.1:

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

Emission Unit: U-00001 Emission Point: EF-G1

Item 29.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Subpart.

Per 6NYCRR, Subpart 202-1, in order to determine compliance or noncompliance with this emission limit, the source owner is required to submit an acceptable report of measured emissions at the Department's discretion.

To assure compliance with this condition the source owner operator shall operate spray booth with fiberglass filters certified by the manufacturer to a minimum 99.6 % efficiency. Logs indicating that filter is properly in place and when changed will be maintained on a weekly basis.

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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 30: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-2.4 (b)

Item 30.1:



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

Emission Unit: U-00001 Emission Point: EF-G1

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

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

(1) No facility owner or operator shall cause or allow emissions of particulate that exceed 0.05 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

Per 6NYCRR, Subpart 202-1, in order to determine compliance or noncompliance with this emission limit, the source owner is required to submit an acceptable report of measured emissions at the Department's discretion.

To assure compliance with this condition the source owner operator shall operate spray booth with fiberglass filters certified by the manufacturer to a minimum 99.6% efficiency. Logs indicating that filters are properly in place and when changed will be maintained on a weekly basis for each process.

Upper Permit Limit: .05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 31: Compliance Certification
Effective for entire length of Permit

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

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Item 31.1:

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

Emission Unit: U-00001

Emission Point: EFPR1

Item 31.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Subpart.

Per 6NYCRR, Subpart 202-1, in order to determine compliance or noncompliance with this emission limit, the source owner is required to submit an acceptable report of measured emissions at the Department's discretion.

To assure compliance with this condition the source owner operator shall operate spray booth with fiberglass filters certified by the manufacturer to a minimum 99.6 % efficiency. Logs indicating that filter is properly in place and when changed will be maintained on a weekly basis.

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: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 32: Compliance Certification
Effective for entire length of Permit

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

Item 32.1:

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

Emission Unit: U-00001

Process: P03



Emission Unit: U-00001
Process: P06

Emission Unit: U-00001
Process: PO7

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;

(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

(g) clean hand held spray guns by one of the following:

(1) an enclosed spray gun cleaning system that is kept

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- closed when not in use;
- (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
- (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
- (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Monitoring Frequency: WHEN THE SOURCE IS OPERATING

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 30 days after first semi-annual (6 month) period following Permit Issue Date

Condition 33: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 228-1.4 (b) (5)

Item 33.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: P03

Emission Unit: U-00001
Process: PO7

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Miscellaneous plastic parts coatings

(i) A facility applying Miscellaneous Plastic Parts Coatings must use application techniques as specified in section 228-1.3(e)(3) of this Subpart.

(ii) A facility applying miscellaneous plastic parts coatings may not use coatings with VOC contents, as applied, which exceed the limits specified in table B5. The units in table B5 are in terms of weight (pounds) of VOC per volume (gallons) of coating (minus water and excluded compounds) at application.

Table B5 Miscellaneous Plastic Parts Coatings Coating Category VOC Content Limit (lb VOC/gal)



General one component - 2.3
General Multi-Component - 3.5
Electric Dissipating Coatings and Shok-Free Coatings -
6.7
Extreme Performance (2-pack coatings) - 3.5
Metallic - 3.5
Military Specification (1-Pack) - 2.8 (2-Pack) - 3.5

Mold-Seal - 6.3
Multi-colored Coatings - 5.7
Optical Coatings - 6.7
Vacuum-Metalizing - 6.7

(iii) For miscellaneous plastic parts coating, the following types of coatings and coating operations are exempt from the VOC content limits of table B5:

- (a) touch-up and repair coatings;
- (b) stencil coatings applied on clear or transparent substrates;
- (c) clear or translucent coatings;
- (d) coatings applied at a paint manufacturing facility while conducting performance tests on the coatings;
- (e) Any individual coating category used in volumes less than 50 gallons in any 12 month period, if substitute compliant coatings are not available, provided that the total usage of all such coatings does not exceed 200 gallons in a 12 month period. Records of such coating must be maintained in accordance with section 228-1.3(b)(2) of this Subpart of the general requirements;
- (f) reflective coating applied to highway cones;
- (g) mask coatings that are less than 0.5 millimeters thick (dried) and the area coated is less than 25 square inches;
- (h) EMI/RFI shielding coatings; and
- (i) heparin-benzalkonium chloride (HBAC)-containing coatings applied to medical devices, provided that the total usage of all such coatings does not exceed 100 gallons in a 12 month period. Records of such low use coating must be maintained in accordance with section 228-1.3(b)(2) of this Subpart of the general requirements.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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Non base coat/clearcoat 0.52 4.3

Low bake /Air dried coatings-exterior Parts

Primers 0.58 4.8

Basecoat 0.60 5.0

Clearcoats 0.54 4.5

Non base coat/clearcoat 0.60 5.0

Lowbake/ air dried coatings-interior parts 0.60
5.0

Touchup and repair coatings 0.62 5.2

Business Machine Coatings

Primers 0.35 2.9

Topcoats 0.35 2.9

Texture coats 0.35 2.9

Fog coats 0.26 2.2

Touchup and repair 0.35 2.9

(iii) For coating Automotive/Transportation and Business Machine Plastic Parts, the following types of coatings and coating operations are exempt from the VOC content limits of table B6:

- (a) texture coatings;
- (b) vacuum metalizing coatings;
- (c) gloss reducers;
- (d) texture topcoats;
- (e) adhesion primers;
- (f) electrostatic preparation coatings;
- (g) resist coatings; and
- (h) stencil coatings

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 35: Compliance Certification
Effective for entire length of Permit



Applicable Federal Requirement:6 NYCRR 228-2.4 (a)

Item 35.1:

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

Emission Unit: U-00001
Process: P04

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) VOC content limits. Except as provided in section 228-2.2 of this Subpart, no person shall use, apply, solicit, require the use of, specify the application of, sell, supply, offer for sale, or manufacture for sale in the State of New York any commercial or industrial adhesive, sealant, adhesive primer or sealant primer unless such adhesive, sealant, adhesive primer or sealant primer complies with the applicable VOC content limits specified in table 1 of this subdivision and the applicable requirements of this Subpart. For adhesives applied to the listed substrates, the VOC content limits in table 1 of this subdivision apply as follows:

(1) 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 of this subdivision, such specific limit is applicable rather than an adhesive-to-listed-substrate limit; and

(2) 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.

Table 1. VOC Content Limits for Adhesives, Sealants, Adhesive Primers, Sealant Primers and Adhesives Applied to the Listed Substrates

VOC content limit (grams per liter)

Adhesives

ABS welding	400
Ceramic tile installation	130
Computer diskette jacket manufacturing	850
Contact bond	250
Contact bond -- specialty substrate	250
Cove base installation	150

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CPVC welding	490	
Indoor floor covering installation	150	
Metal to urethane/rubber molding or casting		850
Multipurpose construction	200	
Nonmembrane roof installation/repair	300	
Other plastic cement welding	510	
Outdoor floor covering installation	250	
PVC welding	510	
Single-ply roof membrane installation/repair		250
Structural glazing	100	
Thin metal laminating	780	
Tire retread	100	
Perimeter bonded sheet vinyl flooring installation		660
Waterproof resorcinol glue	170	
Sheet-applied rubber installation	850	
Sealants		
Architectural	250	
Marine deck	760	
Nonmembrane roof installation/repair	300	
Roadway	250	
Single-ply roof membrane	450	
Other	420	
Adhesive Primers		
Automotive glass	700	
Plastic cement welding	650	
Single-ply roof membrane	250	
Traffic marking tape	150	
Other	250	
Sealant Primers		
Non-porous architectural	250	
Porous architectural	775	
Marine deck	760	
Other	750	
Adhesives Applied to the Listed Substrate		
Flexible vinyl	250	
Fiberglass	200	
Metal	30	
Porous material	120	
Rubber	250	
Other substrates	250	

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 36: General Provisions
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.4501, Subpart PPPP

Item 36.1:

Table 2 to subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the facility.

Condition 37: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.4520(a), Subpart PPPP

Item 37.1:

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

Emission Unit: U-00001
Process: P04

Emission Unit: U-00001
Process: P06

Emission Unit: U-00001
Process: PO7

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Source owner or operator must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section.

(1) Dates. Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months



of data prior to the date of each monthly calculation.

(i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.4540, §63.4550, or §63.4560 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.

(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iii) Each semiannual 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.

(iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

(2) Inclusion with title V report. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(3) General requirements. The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (vii) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected



source.

- (i) Company name and address.
- (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (iv) Identification of the compliance option or options specified in §63.4491 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used.
- (v) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.4491(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
- (vi)...
- (vii)...

(4) No deviations. If there were no deviations from the emission limitations in §§63.4490, 63.4492, and 63.4493 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

(5) ...

- (6) Deviations: Emission rate without add-on controls option. If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.4490, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.
- (i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.4490.
 - (ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in



which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.4551; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4551(e)(4). You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

(7)...

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 38: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.4530(a), Subpart PPPP

Item 38.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: P04

Emission Unit: U-00001
Process: P06

Emission Unit: U-00001
Process: PO7

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The source owner or operator must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. If you are using the predominant activity alternative under §63.4490(c), you must keep records of the data and



calculations used to determine the predominant activity. If you are using the facility-specific emission limit alternative under §63.4490(c), you must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. You must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or mass fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.

(2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 1 of §63.4541.

(3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.4551 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of §63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.4551.

(4) ...

(d) A record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may



maintain purchase records for each material used rather than a record of the mass used.

(e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(f) A record of the mass fraction of coating solids for each coating used during each compliance period.

(g) If you use an allowance in Equation 1 of §63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.4551(e)(4), you must keep records of the information specified in paragraphs (g)(1) through (3) of this section.

(1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.4551, a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.

(2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.4551.

(3) The methodology used in accordance with §63.4551(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

(h) You must keep records of the date, time, and duration of each deviation.

(i)...

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 39: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5905, Subpart WWWW

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Item 39.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: P01

Emission Unit: U-00001
Process: P02

Emission Unit: U-00001
Process: P03

Emission Unit: U-00001
Process: P06

Emission Unit: U-00001
Process: P07

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) The owner or operator must submit all of the notifications in Table 13 to this subpart that apply by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 to this subpart.

(b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 40: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.5910(a), Subpart WWWW

Item 40.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001



Process: P01

Emission Unit: U-00001

Process: P02

Emission Unit: U-00001

Process: P03

Emission Unit: U-00001

Process: P06

Emission Unit: U-00001

Process: P07

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must submit each report in Table 14 to this subpart that applies.

(b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date specified in Table 14 to this subpart and according to paragraphs (b)(1) through (5) of this section.

(1 -4) ...

(5) For each affected source that is subject to permitting requirements pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6 (a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must contain the information in paragraphs (c)(1) through (6) of this section:

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period.

(4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with



your startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).

(5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in Table 4 to this subpart, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

(6) ...

(d) For each deviation from an organic HAP emissions limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where you are not using a CMS to comply with the organic HAP emissions limitations or work practice standards in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (4) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction.

(1) The total operating time of each affected source during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(e)...

(f) You must report if you have exceeded the 100 tpy organic HAP emissions threshold if that exceedance would make your facility subject to §63.5805(a)(1) or (d). Include with this report any request for an exemption under §63.5805(e). If you receive an exemption under §63.5805(e) and subsequently exceed the 100 tpy organic HAP emissions threshold, you must report this exceedance as required in §63.5805(f).

(g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 14 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating

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limit) or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(h) Submit compliance reports and startup, shutdown, and malfunction reports based on the requirements in table 14 to this subpart, and not based on the requirements in §63.999.

(i) Where multiple compliance options are available, you must state in your next compliance report if you have changed compliance options since your last compliance report.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 41: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.5915, Subpart WWWW

Item 41.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: P01

Emission Unit: U-00001
Process: P02

Emission Unit: U-00001
Process: P03

Emission Unit: U-00001
Process: P06

Emission Unit: U-00001
Process: P07

Item 41.2:

Compliance Certification shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) Owner or operator must keep the records listed in paragraphs (a)(1) through (3) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in §63.10(b)(2)(xiv).

(2) ...

(3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).

(b) ...

(c) You must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in tables 3, 5, and 7 to this subpart.

(d) You must keep a certified statement that you are in compliance with the work practice requirements in Table 4 to this subpart, as applicable.

(e) ...

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(a) Owner or operator must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.

(d) You may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

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

**Condition 42: Emission Point Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 42.1:

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.): 621.23	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.): 4948.54	NYTME (km.): 621.21	Building: Bld001	
Emission Point: EF-B1			
Height (ft.): 40	Diameter (in.): 34		
NYTMN (km.): 4948.56	NYTME (km.): 621.22	Building: Bld001	
Emission Point: EF-G1			
Height (ft.): 40	Diameter (in.): 42		
NYTMN (km.): 4948.51	NYTME (km.): 621.21	Building: Bld001	
Emission Point: EFPR1			
Height (ft.): 40	Diameter (in.): 34		
NYTMN (km.): 4948.54	NYTME (km.): 621.25	Building: Bld001	

**Condition 43: Process Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 43.1:

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:	



Process P01 is a gel coat operation. Styrene-based catalyzed gel coats are applied to molds in a spray booth via non-atomized application techniques. The booth is approximately 14 feet wide by 30 feet deep, exhausting approximately 16,000 CFM through emission point EF-G1. The booth contains exhaust filters (ES GFLT1) for particulate control. The filters have a capture efficiency of approximately 99.6% as tested on atomized paint. The non-atomized gel coat application techniques utilized in this booth will result in an overspray particle size of more than 10 times the aerodynamic diameter of traditional atomized paint application. Capture of particulate overspray should easily be at or above 99.6% removal efficiency. Additionally, transfer efficiency and fall-out is estimated by the applicant at 90% and 95%, respectively. After the parts are gel coated they are allowed to cure adequately in the curing area (ES GCCUR) and then moved to either the hand lamination area (Process PO2) or the resin transfer molding (RTM) area (Process PO3). The curing area is exhausted through emission point EF-2 at approximately 16,000 CFM.

Materials used in this process will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions from this process.

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

Emission Source/Control: GC001 - Process

Emission Source/Control: GCCUR - Process

Item 43.2:

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:

Process P02 is an open molding operation. In the open molding operation, a "barrier" or "skin" coat of filled resin may be applied via non-atomized methods to the gel coated surface. Following the skin coat, a mixture of filled styrene-based resin and fabric, pre-cut to the proper size, will then be applied via non-atomized methods to the surface. Hand rollers are used to remove air from the layup after sufficient layers of resin coated fiberglass mat are applied to the mold. Resin is generally mixed in various size containers depending upon the amount of layup to be performed. Smaller containers, usually 1 gallon open top cans, are then catalyzed at or



near the point of application and applied by individuals by pouring and brushing and rolling the resin into glass fiber. The estimated maximum rate that resin can be applied is 175 pounds per hour of resin mixture. 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. 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.

Materials used in this process will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions from this process.

Emission Source/Control: OAREA - Process

Item 43.3:

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 gel coat. A mold release and mold seal materials may be applied to facilitate removal of the next part from the mold. Emissions are calculated to be 100% of available VOC/HAP except those of catalyzed styrene and methyl methacrylate containing materials whose emission factors may be obtained from UEF Table-1. When the mold is prepped and ready, it is returned to the gel coat booth to begin the manufacturing process again. The demolding area is exhausted by a 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. Drilling holes and removing 'cut-outs' is also preformed in this area. (These operations are 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 too 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.

Materials used in this process will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions from this process.

Emission Source/Control: MPREP - Process

Item 43.4:

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:

Process P04 is a bonding operation. Various fiberglass reinforced parts, insulation, carpet and similar materials are bonded to one another in the Bonding Room (ES BOND1) with catalyzed bonding materials as well as solvent based adhesives. HAP and VOC species generated by this activity are exhausted by a fan, designated as emission point EF-B1.

Parts entering this operation may be a.) cleaned with a non-VOC/HAP containing wipe down solvent, b.) chemically bonded with other parts utilizing a VOC/HAP containing bonding putty or adhesive, or c.) touched up and readied for shipment or painting. Various VOC and HAP containing materials are applied by pump and by hand. Emissions of styrene and methyl methacrylate from bonding putties are calculated at 1%wt of available styrene and MMA, based upon vendor tests as well as closed molding emission factors. Other emissions of VOC and HAP are calculated to be 100% of available VOC/HAP. There are no emission controls associated with Bonding and Assembly. VOC and HAP emissions will predominately be exhausted by the fan designated as EF-B1, though some emissions will be fugitive exhausting through other process exhaust systems.

Materials used in this process will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions from this process.

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Emission Source/Control: BOND1 - Process

Item 43.5:

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

Emission Unit: U-00001

Process: P06

Source Classification Code: 3-08-007-99

Process Description:

Production resins are transferred by hand from covered storage containers/tanks to up to five (5) 200 liter covered mixing tanks (ES MXTKS) in the dispensing areas. 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 43.6:

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

Emission Unit: U-00001

Process: P05

Source Classification Code: 3-08-007-36

Process Description:

Process P05 is a Resin Transfer Molding (RTM) operation. In the RTM process, partially cured gel coat molds are covered with an assortment of fiberglass mat materials which have been pre-cut to proper dimensions in the Fiber Layup area (ES LAYUP). After layup a second counter mold is placed over the previously gel coated mold holding the glass and the two are locked together. The counter mold may also be gel coated. Various resins, delivered from the mixing station, are then pumped with vacuum assist into the mold cavity filling the void space between the fiberglass mat and mold. Resin is generally mixed in 55-gallon drums and catalyzed as it is pumped.. The estimated maximum rate that resin can be applied is 175 pounds per hour of resin mixture. 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). Emissions from RTM are very low (applicant estimates MMA and Styrene emissions at 1% by weight). VOC and HAP emissions are exhausted by a fan designated as emission point EF-03, though some emissions may be fugitive..

Materials used in this process will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions



from this process. There will be no designated emission point for this source as all emissions are considered fugitive.

Emission Source/Control: LAYUP - Process

Emission Source/Control: RMINJ - Process

Item 43.7:

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

Emission Unit: U-00001

Process: PO7

Source Classification Code: 4-02-022-40

Process Description:

Process P07 is surface coating and texture coating operation. Surface coatings applied in this booth are generally not gel coats, texture coats may be gel coats. In the paint booth plastic parts are surface coated and texture coated. The booth is approximately 14 feet wide by 24 feet deep. The exhaust from the paint booth is approximately 17,150 CFM and is vented through emission point EF-PR1. The paint booth contains exhaust filters (ES PAINT) for particulate control. The filters have an approximate 99.6% removal efficiency as tested on atomized paint

Paint is applied via HVLP (High Volume Low Pressure) atomized spray equipment (ES HVLP4). The spray gun utilized is gravity fed cup guns with a cup capacity of approximately 10 fluid ounces. Texture coats may be applied by either non-atomized gel coat equipment or HVLP equipment. Regardless of application method, texture coating applies non-atomized large droplets the part to produce an irregular surface. The maximum operating time of each cup gun is 30 minutes per hour, usually 10 minutes application time per cup and 10 minutes clean and setup, yielding a usage rate of 60 fluid ounces per hour for each of two cup guns, or 120 fluid ounces per hour paint application. 120 fluid ounces is equivalent to 1.0 gallons at 12 pounds per gallon which results in a maximum application rate of 12 pounds per hour paint. When gel coat application equipment is used to apply texture coats the application rate will be equal to or less than 12 pound per hour. All VOCs and HAPs are assumed to be emitted to the atmosphere excepting catalyzed coatings.

Note, unlike paint surface coatings operations which are subject to 40 CFR 63, Subpart PPPP, texture gel coats operations are subject to 40 CFR 63, Subpart WWWW.

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Materials used in this process will be logged daily. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions from this process.

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 44: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-1.5 (f)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility owners or operators whose process operations VOCs and meet the applicability requirements of Subpart 212-3 of this Part are not subject to the control provisions in Subpart 212-2 of this Part. However, if an individual air contaminant, as a component of total VOCs, is assigned an environmental rating of A, that individual air contaminant must meet the control requirements of Subpart 212-2 of this Part.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 45: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 228-2.4 (d)

Item 45.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:



Emission Unit: U-00001
Process: P04

Emission Unit: U-00001
Process: P06

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

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Work practices shall be employed at facilities where the total actual VOC emissions from all industrial adhesive application processes, including related cleaning activities, equal or exceed three tons in a 12-month rolling period, before consideration of emission control equipment. Work practices 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 46: Compliance Certification
Effective for entire length of Permit**

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

Item 46.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001

Process: P04

Emission Unit: U-00001

Process: P06

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without add-on control option, or §63.4561 if the facility chooses to use an add-on control device to meet the emission limit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 48: Maintenance of records
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.4531, Subpart PPPP

Item 48.1:

This Condition applies to:

Emission Unit: U00001
Process: P04

Emission Unit: U00001
Process: P06

Emission Unit: U00001
Process: PO7

Item 48.1:

This Condition applies to Emission Unit: U-00001

Item 48.2.3:

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

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

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

Condition 49: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.4552, Subpart PPPP

Item 49.1:

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

Emission Unit: U-00001
Process: P04

Emission Unit: U-00001
Process: PO7

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

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.4551(a)-(g), must be less than or equal to the applicable emission limit in §63.4490. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.4550 is the end of a compliance period consisting of that month and the preceding 11 months. The facility must perform the calculations in §63.4551(a)-(g) on a monthly basis using data from the previous 12 months of operation.

If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.4490, this is a deviation from the emission limit for that compliance period and must be reported as specified in §63.4510(c)(6) and §63.4520(a)(6).

As part of each semiannual compliance report required by §63.4520, the facility must identify the coating operation for which the emission rate without add-on controls option was used. If there were no deviations from the emission limitations, the facility must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.4490, determined according to §63.4551(a)-(g).

The facility must keep records as specified in §63.4530 and §63.4531.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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



Condition 50: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5810(c), Subpart WWWW

Item 50.1:

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

Emission Unit: U-00001
Process: P01

Emission Unit: U-00001
Process: P02

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

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall demonstrate each month that the facility meets each weighted average of the organic HAP emission limits in table 3 or 5 of subpart WWWW that apply. When using this option, the facility must demonstrate compliance with the weighted average organic HAP emission limit for all open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emission limit for all centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

Each month the facility must calculate the weighted average organic HAP emission limit for all open molding operations and the weighted average organic HAP emission limit for all centrifugal casting operations for the facility for the last 12-month period to determine the organic HAP emission limit that the facility must meet by using equation 3 listed in §63.5810(c)(1).

Each month the facility must then calculate the weighted average organic HAP emission factor for open molding and centrifugal casting by using equation 4 as listed in §63.5810(c)(2).

The facility shall then compare the values calculated above and if each 12-month rolling average organic HAP emission factor is less than or equal to the corresponding

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12-month rolling average organic HAP emission limit, then the facility is in compliance.

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5895(c), Subpart WWWW

Item 51.1:

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

Emission Unit: U-00001
Process: P01

Emission Unit: U-00001
Process: P02

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

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the facility is meeting any organic HAP emission limit based on an organic HAP emission limit in tables 3 or 5 of subpart WWWW.

The facility must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the facility is meeting any organic HAP content limits in table 7 of subpart WWWW if the facility is averaging organic HAP contents.

Resin use records may be based on purchase records if the facility can reasonably estimate how the resin is applied.

The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.
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Condition 52: 5900(a)(4) - Continuous compliance with work practice standards
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.5900, Subpart WWWW

Item 52.1:

This Condition applies to:

Emission Unit: U00001
Process: P01

Emission Unit: U00001
Process: P02

Emission Unit: U00001
Process: P03

Emission Unit: U00001
Process: P06

Item 52.1:

This Condition applies to Emission Unit: U-00001

Item 52.2.3:

Compliance with the work practice standards in table 4 of subpart WWWW is demonstrated by performing the work practice required for the operation.

Condition 53: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.5900, Subpart WWWW

Item 53.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: P01

Emission Unit: U-00001
Process: P02

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

Item 53.2:

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Compliance with organic HAP emission limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emission limit listed in table 3 or 5 of subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d).

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 54: General provisions
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.5925, Subpart WWWW

Item 54.1:

This Condition applies to Emission Unit: U-00001

Item 54.2:

Table 15 of subpart WWWW shows which parts of the general provisions listed in subpart A of 40CFR63 apply to the facility.

**Condition 55: Compliance Certification
Effective for entire length of Permit**

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

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Process: P04

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 55.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities using products subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) shall maintain records

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demonstrating compliance with the VOC content limits, 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 facility;
- (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 facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 56: Compliance Certification
Effective for entire length of Permit**

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

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Process: P04

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 56.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each manufacturer of a commercial or industrial adhesive,



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sealant, adhesive primer or sealant primer shall calculate the VOC content using the manufacturer's formulation data or determined using the calculations, procedures and test methods in 6 NYCRR Part 228-2.6.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 57: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Item 57.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001
Process: P03

Emission Unit: U-00001
Process: P06

Emission Unit: U-00001
Process: P07

Item 57.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the

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overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.

5. Any additional information required to determine compliance with Part 228-1.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 58: Compliance Certification
Effective for entire length of Permit

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

Item 58.1:

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

Emission Unit: U-00001
Process: P03

Emission Unit: U-00001
Process: P07

Item 58.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Reference Test Method: EPA Reference Test Method 311 or 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 59: Compliance Certification
Effective for entire length of Permit

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

Item 59.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001

Process: P03

Emission Unit: U-00001

Process: P06

Emission Unit: U-00001

Process: PO7

Item 59.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

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

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

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

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and



standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

STATE ONLY APPLICABLE REQUIREMENTS

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

Condition 60: Contaminant List
Effective for entire length of Permit

Applicable State Requirement:ECL 19-0301

Item 60.1:

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

CAS No: 000062-53-3
Name: ANILINE

CAS No: 000067-64-1
Name: DIMETHYL KETONE

CAS No: 000085-68-7
Name: BUTYL BENZYL PHTHALATE

CAS No: 000100-42-5
Name: STYRENE

CAS No: 000101-68-8
Name: METHYLENE BISPHENYL ISOCYANATE

CAS No: 000131-11-3
Name: DIMETHYL PHTHALATE

CAS No: 000136-52-7
Name: HEXANOIC ACID, 2-ETHYL COBALT 2+

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CAS No: 001345-16-0
Name: C.I. PIGMENT BLUE 28

CAS No: 004083-64-1
Name: BENZENESULFONYL ISOCYANATE, 4-METHYL-

CAS No: 007440-48-4
Name: COBALT

CAS No: 014808-60-7
Name: QUARTZ

CAS No: 021041-93-0
Name: COBALT HYDROXIDE

CAS No: 027253-31-2
Name: NEODECANOIC ACID, COBALT SALT

CAS No: 028182-81-2
Name: DIISOCYANATE,1-6-HEXAMETHYLENE

CAS No: 0NY075-00-0
Name: PARTICULATES

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

CAS No: 0NY998-00-0
Name: VOC

CAS No: 104810-48-2
Name: POLYETHYLENE GLYCOL
MONO-3-[3-(2H-BENZOTRIAZOL-2-YL)-5-TERT-BUTYL-4-HY

CAS No: 112926-00-8
Name: SILICA GEL,CRYSTILINE FREE

**Condition 61: Malfunctions and start-up/shutdown activities
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 201-1.4

Item 61.1:

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

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to

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

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

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

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

**Condition 62: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement: 6 NYCRR 212-2.1 (a)

Item 62.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000101-68-8	METHYLENE BISPHENYL ISOCYANATE
CAS No: 028182-81-2	DIISOCYANATE,1-6-HEXAMETHYLENE
CAS No: 004083-64-1	BENZENESULFONYL ISOCYANATE,

4-METHYL-

Item 62.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For an air contaminant listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant List, of this Part, the facility owner or operator shall limit the actual annual emissions from all process operations at the facility so

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as to not exceed the mass emission limit listed for the individual HTAC.

Diisocyanate Compounds (TOTAL) = 100 pounds per year

Materials used in emission processes will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the HTAC emissions from all processes. All records required to document compliance 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.

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

**Condition 63: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement: 6 NYCRR 212-2.1 (a)

Item 63.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000062-53-3 ANILINE

Item 63.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

For an air contaminant listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant List, of this Part, the facility owner or operator shall limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC.

(000062-53-3) Aniline = 1000 pounds per year

Materials used in emission processes will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the HTAC emissions from all processes. All records required to document compliance 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.

Monitoring Frequency: MONTHLY



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 64: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 212-2.1 (a)

Item 64.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 64.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For an air contaminant listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant List, of this Part, the facility owner or operator shall demonstrate compliance with the air cleaning requirements for the HTAC as specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants.

For an HTAC assigned an Environmental Rating of A and has an Emission Rate Potential (ERP) of less than 0.1 pound per hour and annual mass emissions of a persistent and bioaccumulative compound less than the PB Trigger, the owner or operator is required to meet the short term and annual guideline concentration at the fence line of the facility.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 65: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 212-2.3 (b)

Item 65.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00001

Process: P01

Emission Source: GFLT1

Emission Unit: U-00001

Process: PO7

Emission Source: PAINT

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Regulated Contaminant(s):

CAS No: 001345-16-0	C.I. PIGMENT BLUE 28
CAS No: 007440-48-4	COBALT
CAS No: 014808-60-7	QUARTZ
CAS No: 027253-31-2	NEODECANOIC ACID, COBALT SALT
CAS No: 112926-00-8	SILICA GEL, CRYSTALLINE FREE
CAS No: 021041-93-0	COBALT HYDROXIDE
CAS No: 000136-52-7	HEXANOIC ACID, 2-ETHYL COBALT 2+

Item 65.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

These process may emit solid particulate which are given an environmental rating of "A" per 6NYCRR 212-1.3 and are required, based on emission rate potential (ERPs), to achieve 90, 99, or 99.5% control, or greater, or Toxic -Best Available Control Technology (T-BACT) per 6NYCRR 212-2.3(b) Table (4). Based on the facility's estimated emission rate potential (ERPs) and mass emission rates (MER) used in the air dispersion model, these emission control sources shall achieve a minimum particulate control efficiency of 99.6%.

Per 6NYCRR, Subpart 202-1, in order to determine compliance or noncompliance with this emission standard, the source owner is required to submit an acceptable report of measured emissions at the Department's discretion.

To assure compliance with this condition the source owner operator shall equip these processes with fiberglass filters certified by the manufacturer to a minimum 99.6 % efficiency. Logs indicating that filters are properly in place and when changed will be maintained on a weekly basis for each process.

Upper Permit Limit: 99.6 percent reduction by weight

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 66: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement: 6 NYCRR 212-2.3 (b)



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Item 66.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 66.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants for the environmental rating assigned to the contaminant by the department.

A process emission source emitting a Non-HTAC non-criteria air contaminant and having an emission rate potential (ERP) of less than 0.1 pound per hour and an Environmental Rating of A must meet the annual and short term guideline concentrations for the air contaminant at the fence line of the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 67: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement: 6 NYCRR 228-2.4 (b)

Item 67.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00001

Process: P04

Item 67.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Surface preparation and cleanup solvents. Except as provided in section 228-2.2 of this Subpart, no person shall use or apply, solicit, require the use of or specify the application of any surface preparation or clean-up solvent within the State of New York if such use or application results in a violation of the provisions of



this Subpart. Any person using a surface preparation or cleanup 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;

(2) if a surface preparation solvent is used in applying single-ply roofing, the composite vapor pressure, excluding water and exempt compounds, of the surface preparation solvent used, shall not exceed 45 mm Hg at 20° C;

(3) 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; and

(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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

