



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 5-0942-00494/00001
Effective Date:

Expiration Date:

Permit Issued To: BFG INTERNATIONAL USA, LLC
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

Facility: BFG INTERNATIONAL USA LLC - Martina
44 MARTINA CIR
PLATTSBURGH, NY 12901

Description:

BFG manufacturing facility is located at 44 Martina Circle in a metal building approximately 450' long by 150' wide by 20' high. It is located in an industrial park and less than 500' from an airport. BFG will manufacture reinforced plastic composite parts with the principal chemical ingredient being styrene resin. Completed parts and subassemblies are predominantly used in the transportation and recreation industry. The SIC code (3089) Plastic Products, Not Elsewhere Classified and the corresponding NAICS code (326199) All Other Plastics Products Manufacturing, capture the general product manufactured by BFG. The primary methods of manufacture will be resin transfer molding (RTM), hand lamination and surface coating. Those processes will be conducted within the building in designated application booths and areas. No manufacturing will occur outside the building walls. The majority of the emissions generated by the manufacturing operations will be directed to an onsite natural gas fired regenerative thermal oxidizer (RTO) for destruction. Ancillary manufacturing operations will include trimming, grinding and adhesive bonding of subassemblies.

The facility's one permitted emission unit contains all operations consisting of approximately 12 different processes. In general the operations include manufacturing with styrene and methyl methacrylate resin materials applied by spray equipment, applied by hand and applied by resin transfer molding (RTM). Processes also include mold preparation, grinding, trimming, drilling, surface



coating, bonding and other related processes. Most, but not all VOC and HAP emissions will be directed through a (RTO) for destruction of the VOCs and HAPs. This emission unit consists of five emission points labeled EF-01, EF-02, EF-03, EF-04 and EF-05. There are also several fugitive emission areas.

BFG is capping the Potential To Emit (PTE) facility wide emissions to no more than 47.5 tons of Volatile Organic Compounds (VOC) , 24 tons total Hazardous Air Pollutants (HAPs) and 9 tons of any single HAP for any rolling 12-month period in order to avoid applicability of 6 NYCRR Part 212, VOC RACT; and 40 CFR 63 Subparts WWWW and PPPP, National Emission Standards for Hazardous Air Pollutants. This also caps the facility below major source thresholds for Title V permitting. The emissions caps shall be specific to VOCs, total HAPs, Styrene and Methyl Methacrylate. Facility process emissions are regulated primarily 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 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 SUBOFFICE - WARRENSBURG



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



Condition 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
SUBOFFICE - WARRENSBURG
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 Sub-office
Division of Environmental Permits
232 Golf Course Road
Warrensburg, NY 12885-1172
(518) 623-1281

New York State Department of Environmental Conservation

Permit ID: 5-0942-00494/00001

Facility DEC ID: 5094200494



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

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

Facility: BFG INTERNATIONAL USA LLC - Martina
44 MARTINA CIR
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 200.6: Compliance Demonstration
- 3 6 NYCRR 200.6: Compliance Demonstration
- 4 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *6 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *7 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *8 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *9 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *10 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 11 6 NYCRR 211.1: Air pollution prohibited
- 12 6 NYCRR 212-1.1 (a) (1): Compliance Demonstration
- 13 6 NYCRR 212-1.1 (a) (1): Compliance Demonstration
- 14 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 15 6 NYCRR 212-2.4 (b): Compliance Demonstration
- 16 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 17 6 NYCRR 228-1.4 (b) (5): Compliance Demonstration
- 18 6 NYCRR 228-1.4 (b) (6): Compliance Demonstration
- 19 6 NYCRR 228-2.4 (a): Compliance Demonstration

Emission Unit Level

EU=0-00001

- 20 6 NYCRR 212-1.5 (f): Compliance Demonstration
- 21 6 NYCRR 228-2.4 (d): Compliance Demonstration

EU=0-00001,Proc=P09

- 22 6 NYCRR 228-2.5 (a): Compliance Demonstration
- 23 6 NYCRR 228-2.5 (c): Compliance Demonstration

EU=0-00001,Proc=P09

- 24 6 NYCRR 228-2.7 (a): Compliance Demonstration
- 25 6 NYCRR 228-2.7 (b): Compliance Demonstration

EU=0-00001,Proc=P10

- 26 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 27 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 28 6 NYCRR 228-1.3 (e): Surface Coating- application requirements
- 29 6 NYCRR 228-1.6 (a): Compliance Demonstration
- 30 6 NYCRR 228-1.6 (h): Compliance Demonstration

EU=0-00001,Proc=P11

- 31 6 NYCRR 228-2.4 (c): Compliance Demonstration
- 32 6 NYCRR 228-2.5 (b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level



- 33 ECL 19-0301: Contaminant List
- 34 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 35 6 NYCRR Subpart 201-5: Emission Unit Definition
- 36 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 37 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 38 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 39 6 NYCRR 211.2: Visible Emissions Limited
- 40 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 41 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 42 6 NYCRR 212-2.3 (b): Compliance Demonstration
- 43 6 NYCRR 228-2.4 (b): Compliance Demonstration

Emission Unit Level

- 44 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 45 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=0-00001

- 46 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 47 6 NYCRR 212-2.3 (b): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

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

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Acceptable Ambient Air Quality



Effective 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: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 200.6

Item 2.1:

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

Emission Unit: 0-00001 Process: P01	Emission Source: 00002
Emission Unit: 0-00001 Process: P02	Emission Source: 00002
Emission Unit: 0-00001 Process: P03	Emission Source: 00002

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The source owner or operator shall maintain manufacturer's documentation 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 processes (PR 00001, 00002 and 00003). Emissions must be no greater than emissions estimated by the non-atomized application equations used to determine PTEs and actual emissions for capping purposes.

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

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE



Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 200.6

Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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



6. Minimize spills during the handling and transfer of coatings and solvents.

7. Doors & windows shall remain closed to ensure that emissions are captured and exhausted through the stacks with adequate dispersion.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 4: Facility Permissible Emissions
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 4.1:

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

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

CAS No: 000080-62-6 PTE: 18,000 pounds per year
Name: METHYL ACRYLIC ACIDMETHYL ESTER

CAS No: 000100-42-5 PTE: 18,000 pounds per year
Name: STYRENE

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

CAS No: 0NY998-00-0 PTE: 95,000 pounds per year
Name: VOC

**Condition 5: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 5.1:

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

- 6 NYCRR 201-6.1
- 6 NYCRR 212.10
- 6 NYCRR Subpart 231-5
- 40 CFR 63.4481 (b)
- 40 CFR 63.5785

Item 5.2:

New York State Department of Environmental Conservation

Permit ID: 5-0942-00494/00001

Facility DEC ID: 5094200494



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

Item 5.3:

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 5.4:

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

Item 5.5:

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

Item 5.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER
CAS No: 000100-42-5	STYRENE
CAS No: 0NY100-00-0	TOTAL HAP
CAS No: 0NY998-00-0	VOC

Item 5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

- A brief description of the rationale for the



assignment of an equation or factor to each formula (eg., UEF emission factors, manufacturer's emission certifications, technical papers, Table 1 of 63 Subpart WWWW, AP-42, and etc.).

- The identification and usage of VOC and HAP containing reactants, coatings, solvents, adhesives, and etc.
- VOC and (speciated and combined) HAP concentrations for all raw materials used. The owner or operator may rely on information provided by the manufacturer, such as manufacturer's formula data and safety data sheets (SDS).
- Records of the RTO approved destruction efficiency testing.
- A log in the form of a strip chart or NYSDEC approved equal recording device identifying the date, time, and destruction temperature of the RTO.
- Vapor Suppressants require certification of manufacturer's control claims and application instructions.
- Vapor Suppressants require documentation of application date, time of usage, actual formulations and any other 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 the VOC and HAP emissions from all processes. RTO destruction efficiency may only be applied to emissions calculations when the required destruction temperature is achieved. All records required to document compliance with the facility-wide HAP emissions caps shall be maintained on-site for a period of at least five (5) years and made available to NYSDEC and/or USEPA representatives upon request.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 6: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 6.1:

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

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



Item 6.2:

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

Item 6.3:

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 6.4:

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

Item 6.5:

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

Item 6.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 6.7:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:
Facility-wide emissions for total Hazardous Air Pollutant(s) (HAPs) is limited to no more than 24 tons (48,000 pounds) for any consecutive 12 month period. This caps the facility below major source thresholds for these contaminants.

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

On an annual basis, 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: TOTAL HAP

Upper Permit Limit: 24 tons

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 7: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 7.1:

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

6 NYCRR 201-6.1
6 NYCRR 212.10
6 NYCRR Subpart 231-5
40 CFR 63.4481 (b)
40 CFR 63.5785

Item 7.2:

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

Item 7.3:

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 7.4:

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



Item 7.5:

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

Item 7.6:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001

Process: P01

Emission Unit: 0-00001

Process: P02

Emission Unit: 0-00001

Process: P03

Emission Unit: 0-00001

Process: P04

Regulated Contaminant(s):

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

CAS No: 0NY998-00-0 VOC

CAS No: 0NY100-00-0 TOTAL HAP

CAS No: 000100-42-5 STYRENE

Item 7.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A regenerative thermal oxidizer (RTO) shall be used to control emissions of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs) emitted by the emission sources associated with these processes. The RTO shall provide at least 98% control efficiency, or until a new destruction efficiency is demonstrated and approved by the Department. Once approved, the stack testing reestablishes the RTO minimum operating temperature and corresponding destruction efficiency used for calculating process emissions.

The source owner or operator shall perform an initial stack test within 90 days of startup, and once every 5 years thereafter, to determine the control efficiency of the RTO. The control efficiency, along with other records required under this permit, shall be used to determine the facility's compliance status with respect to its emissions caps.

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The required control efficiency is 98%, but may change based upon the results of the next stack test.

The Department reserves the right to require additional stack testing in accordance with 6 NYCRR Part 202.

Lower Permit Limit: 98 percent reduction

Reference Test Method: EPA Method 18

Monitoring Frequency: Once every five years

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 8: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 8.1:

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

6 NYCRR 201-6.1
6 NYCRR 212.10
6 NYCRR Subpart 231-5
40 CFR 63.4481 (b)
40 CFR 63.5785

Item 8.2:

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

Item 8.3:

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 8.4:

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

Item 8.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement,

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for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 8.6:

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

Emission Unit: 0-00001
Process: P01

Emission Unit: 0-00001
Process: P02

Emission Unit: 0-00001
Process: P03

Emission Unit: 0-00001
Process: P04

Regulated Contaminant(s):

CAS No: 000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER
CAS No: 000100-42-5	STYRENE
CAS No: 0NY100-00-0	TOTAL HAP
CAS No: 0NY998-00-0	VOC

Item 8.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

To assure the control efficiency being used to determine compliance with applicable emission caps is being maintained, the minimum temperature of the gases exiting the combustion chamber, or a NYSDEC approved equivalent location, of the regenerative thermal oxidizer (RTO) shall be equal to or greater than 1500 degrees F (i.e., RTO compliance temperature). Process emission sources shall not be operated unless the RTO is at its full compliance temperature. The RTO shall remain in operation at full compliance temperature until the spray booths have been fully purged.

The RTO compliance temperature shall be monitored and recorded at least once every 15 minutes. A log in the form of a strip chart or NYSDEC approved equal recording device identifying the date, time and compliance temperature shall be maintained on-site for a period not less than five years. The temperature monitoring device must be calibrated annually and accurate to within plus or minus 0.75 percent of the temperature measured in



degrees Celsius or plus or minus 2.5 degrees Celsius, whichever is greater.

The minimum RTO compliance temperature and corresponding control efficiency may need to be revised based upon the results of required performance testing.

This parametric monitoring activity also assures the control efficiency used to limit hourly and annual Potential to Emit (PTE) for VOCs and other organics is maintained. 6 NYCRR Part 212 Environmental ratings were in part based on these reported PTEs.

Any deviation from the requirements of this condition shall be reported to the Department within 24-hours.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 9: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 9.1:

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

- 6 NYCRR 201-6.1
- 6 NYCRR 212.10
- 6 NYCRR Subpart 231-5

Item 9.2:

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

Item 9.3:

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 9.4:

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



Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 10.1:

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

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

Item 10.2:

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

Item 10.3:

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 10.4:

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

Item 10.5:

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

Item 10.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000080-62-6 METHYL ACRYLIC ACIDMETHYL ESTER
CAS No: 000100-42-5 STYRENE

Item 10.7:

Compliance Demonstration shall include the following monitoring:

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



Facility-wide emissions for the speciated Hazardous Air Pollutant(s) (HAPs) listed above are limited to no more than 9 tons (18,000 pounds) each for any consecutive 12 month period. This caps the facility below major source thresholds for these contaminants.

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

On an annual basis, as specified below, the responsible official shall provide a certification to the Department that the facility has operated all emission units with 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: SPECIATED HAP (MASS)
Upper Permit Limit: 9 tons
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 11: Air pollution prohibited
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 211.1

Item 11.1:
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 12: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-1.1 (a) (1)



Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000105-76-0
BUTENEDIOIC ACID (Z)-, DIBUTYL ESTER, 2- C12H20O4
CAS No: 006846-50-0
TRIMETHYL-1,3-PENTANEDIOL DIISOBUTYRATE, 2,2,4- C16H30O4
CAS No: 041556-26-7
BIS(1,2,2,6,6-PENTAMETHYL-4-PIPERIDYL) SEBACATE
CAS No: 082919-37-7
DECANEDIOIC ACID, 1-METHYL
10-(1,2,2,6,6-PENTAMETHYL-4-PIPERIDINYL)...
CAS No: 085711-55-3
FATTY ACIDS, TALL-OIL, COMPDS. WITH OLEYLAMINE
CAS No: 104810-48-2
POLY(OXY-1,2-ETHANEDIYL),
.ALPHA.-[3-[3-(2H-BENZOTRIAZOL-2-YL)-5-...
CAS No: 000095-63-6 BENZENE, 1,2,4-TRIMETHYL-

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Section 212-1.3

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.

In accordance with Section 212-1.5(f), process operations emitting VOCs that meet the applicability requirements of Subpart 212-3 of this Part (which includes capping out VOCs) are not subject to the control provisions in Subpart 212-2 of this Part, unless an individual VOC is assigned an Environmental Rating of A.

Based on the approved RTO destruction efficiency required for VOC and HAP capping, emission rate potentials (ERP) and other supporting documentation submitted in application id. no. 5094200494/00001, and/or annual mass emission rates (MER) limits listed below, an environmental rating of B has been assigned to all permitted VOCs and other organic compounds, unless otherwise noted. VOCs and other



organic compounds which achieve compliance with SGC/AGC for ambient impacts at their respective emission rate potentials (ERPs), are assigned an environmental rating of C.

The owner or operator shall not exceed the following 12-month total MER limits, rolled monthly. VOC and other organic emissions shall be calculated based on methods, and monitoring frequency described under VOC/HAP capping requirements in this permit.

CAS Nos.	lbs/12-months
000095-63-6	2500
000105-76-0	300
041556-26-7	55
082919-37-7	55
085711-55-3	550
104810-48-2	55
006846-50-0	180 (Process 05)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 13: Compliance Demonstration
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 212-1.1 (a) (1)

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Section 212-1.3

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

In accordance with Section 212-1.5(f), process operations emitting VOCs that meet the applicability requirements of Subpart 212-3 of this Part (which includes capping out VOCs) are not subject to the control provisions in Subpart 212-2 of this Part, unless an individual VOC is assigned an Environmental Rating of A.

Based on a minimum 98% destruction efficiency required for VOC and HAP capping, emission rate potentials (ERP) and other supporting documentation submitted in application id. no. 5094200494/00001, and/or annual mass emission rates limits required by other conditions in this permit, an environmental rating of B has been assigned to all permitted VOCs and other organic compounds, unless otherwise noted. VOCs and other organic compounds which achieve compliance with SGC/AGC for ambient impacts at their respective emission rate potentials (ERPs), are assigned an environmental rating of C.

For B-rated contaminants submitted in application id. no. 5094200494/00001, with hourly and annual PTEs which were based on the RTO achieving a specified VOC destruction efficiency, the owner or operator shall perform and submit an acceptable facility-wide toxic impact assessment report within 60-days of any approved stack test which demonstrates a destruction efficiency resulting in an increase in PTEs. A new environmental rating and required degree of air cleaning may be assigned along with a compliance demonstration based on the results of the analysis. If the existing environmental rating is determined acceptable, the new RTO VOC/HAP destruction efficiency may be used for capping and Part 212 compliance assurance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 14: Compliance Demonstration
Effective for entire length of Permit

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

Item 14.1:

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

Emission Unit: 0-00001

Emission Point: EF-01



Emission Unit: 0-00001

Emission Point: EF-02

Emission Unit: 0-00001

Emission Point: EF-03

Item 14.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

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 equip processes 01, 02, and 03 with fiberglass filters certified by the manufacturer to a minimum 99.6 % efficiency. Emission points 02 and 03 shall be equipped with paper filters certified by the manufacturer to a minimum 99.9% efficiency. Logs indicating that filters are properly in place and when changed will be maintained on a weekly basis for each process.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 15: Compliance Demonstration
Effective for entire length of Permit

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

Item 15.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001

Emission Point: EF-01

Emission Unit: 0-00001

Emission Point: EF-02



Emission Unit: 0-00001

Emission Point: EF-03

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 15.2:

Compliance Demonstration 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 equip processes 01, 02, and 03 with fiberglass filters certified by the manufacturer to a minimum 99.6 % efficiency. Emission points 02 and 03 will be equipped with paper filters certified by the manufacturer to a minimum 99.9% 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: 0.05 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: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 16: Compliance Demonstration
Effective for entire length of Permit**

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

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Item 16.1:

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

Emission Unit: 0-00001

Emission Point: EF-04

Item 16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any 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 equip emission point 04 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: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 17: Compliance Demonstration
Effective for entire length of Permit

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

Item 17.1:

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

Emission Unit: 0-00001

Process: P06

Emission Unit: 0-00001

Process: P10



Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(5) 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: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration
Effective for entire length of Permit

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

Item 18.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001

Process: P10

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Automotive/transportation and business machine plastic parts coatings.

(i) A facility applying automotive/transportation and business machine plastic parts coatings must use application techniques as specified in section 228-1.3(e)(3) of this Subpart.

(ii) A facility applying coatings to automotive/transportation and business machine plastic parts may not use coatings with VOC contents, as applied, which exceed the limits specified in table B6. The units in table B6 are in terms of weight (kilograms or pounds) of VOC per volume (liters or gallons) of coating (minus



water and excluded compounds) at application.

Table B6 Automotive/Transportation and Business Machine Plastic Parts

Coating Category	VOC Content Limits	
	Kg VOC/liter	Lbs VOC/gal

High bake coatings- interior and exterior parts

Flexible primer	0.54	4.5
Non-flexible primer	0.42	3.5
Base coats 0.52	4.3	
Clear coats 0.48	4.0	
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
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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: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Compliance Demonstration
Effective for entire length of Permit

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

Item 19.1:

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

Emission Unit: 0-00001
Process: P09

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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	
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	

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Rubber 250
Other substrates 250

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 20: Compliance Demonstration
Effective for entire length of Permit

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

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 20.2:

Compliance Demonstration 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: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 21: Compliance Demonstration
Effective for entire length of Permit

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

Item 21.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001
Process: P09

Emission Unit: 0-00001
Process: P11



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: UPON REQUEST BY REGULATORY AGENCY

**Condition 22: Compliance Demonstration
Effective for entire length of Permit**

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

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: P09

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 22.2:

Compliance Demonstration 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 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: UPON REQUEST BY REGULATORY AGENCY

Condition 23: Compliance Demonstration
Effective for entire length of Permit

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

Item 23.1:

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

Emission Unit: 0-00001
Process: P09

Emission Unit: 0-00001
Process: P11

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

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records made to determine compliance with Subpart 228-2 shall be maintained for five years from the date



such record is created and shall be made available to the Department within 90 days of a request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 24: Compliance Demonstration
Effective for entire length of Permit**

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

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: P09

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each manufacturer of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) shall display the following information on the container or label:

(1) a statement of the manufacturer's recommendation regarding thinning, reducing or mixing, provided:

(i) a statement is not required for thinning, reducing or mixing with water; and

(ii) if thinning prior to use is not necessary, the recommendation shall specify that the product is to be applied as supplied;

(2) the maximum or the actual VOC content as supplied, displayed in grams of VOC per liter of product; and

(3) the maximum or the actual VOC content as applied in accordance with the manufacturer's recommendation regarding thinning, reducing or mixing, displayed in grams of VOC per liter of applied product.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 25: Compliance Demonstration
Effective for entire length of Permit

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

Item 25.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001

Process: P11

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each manufacturer of a commercial or industrial adhesive, 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: UPON REQUEST BY REGULATORY AGENCY

Condition 26: Compliance Demonstration
Effective for entire length of Permit

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

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: P10

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



least five years:

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 27: Surface Coating - Handling, storage and disposal Effective for entire length of Permit

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

Item 27.1:

This Condition applies to Emission Unit: 0-00001
Process: P10

Item 27.2:

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

- (1) 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;
- (2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;



(4) 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;

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

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

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

(i) an enclosed spray gun cleaning system that is kept closed when not in use;

(ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

**Condition 28: Surface Coating- application requirements
Effective for entire length of Permit**

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

Item 28.1:

This Condition applies to Emission Unit: 0-00001

Process: P10

Item 28.2:

Facilities operating coating lines must use one or more of the following application techniques to apply the coating:

(i) flow/curtain coating;

(ii) dip coating;

(iii) cotton-tipped swab application;

(iv) electro-deposition coating;

(v) high volume low pressure spraying;

(vi) electrostatic spray;



(vii) airless spray, (including air assisted);

(viii) airbrush application methods for stenciling, lettering, and other identification markings; or

(ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

**Condition 29: Compliance Demonstration
Effective for entire length of Permit**

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

Item 29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: P10

Item 29.2:

Compliance Demonstration 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 DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 30: Compliance Demonstration
Effective for entire length of Permit**

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



Item 30.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: P10

Item 30.2:

Compliance Demonstration 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

**Condition 31: Compliance Demonstration
Effective for entire length of Permit**

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

Item 31.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Process: P11

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 31.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

When a facility achieves compliance by using add-on air pollution control equipment, the equipment must meet the following requirements:

- (1) the VOC emissions from the use of all adhesives, sealants, adhesive primers or sealant primers must be reduced by an overall capture and control efficiency of at least 85 percent, by weight;
- (2) the combustion temperature is monitored continuously if a thermal oxidizer is operated;
- (3) inlet and exhaust gas temperatures are monitored



continuously if a catalytic oxidizer is operated;

(4) control device efficiency is monitored continuously if a carbon absorber or control device other than a thermal or catalytic oxidizer is operated; and

(5) operation records sufficient to demonstrate compliance with the requirements of this condition and are maintained as required by 6 NYCRR Part 228-2.5.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 32: Compliance Demonstration
Effective for entire length of Permit**

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

Item 32.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001
Process: P11

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

Item 32.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities that comply with the VOC content limits in 6 NYCRR Part 228-2.4(a) through the use of add-on air pollution control equipment shall record the key operating parameters for the control equipment, including but not limited to, the following information:

(1) the volume used per day of each adhesive, sealant, adhesive primer, sealant primer or solvent listed in Table 1 of 6 NYCRR Part 228-2.4(a);

(2) on a daily basis, the combustion temperature, inlet and exhaust gas temperatures and control device efficiency, as appropriate, pursuant to 6 NYCRR Part 228-2.4(c);

(3) daily hours of operation; and

(4) all maintenance performed including the date and type of maintenance.



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 33: Contaminant List
Effective for entire length of Permit



Applicable State Requirement:ECL 19-0301

Item 33.1:

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: 000080-62-6

Name: METHYL ACRYLIC ACIDMETHYL ESTER

CAS No: 000095-63-6

Name: BENZENE, 1,2,4-TRIMETHYL-

CAS No: 000100-42-5

Name: STYRENE

CAS No: 000105-76-0

Name: BUTENEDIOIC ACID (Z)-, DIBUTYL ESTER, 2- C12H20O4

CAS No: 000136-52-7

Name: HEXANOIC ACID, 2-ETHYL COBALT 2+

CAS No: 000822-06-0

Name: HEXANE, 1,6-DIISOCYANATO-

CAS No: 001309-64-4

Name: ANTIMONY TRIOXIDE

CAS No: 001345-16-0

Name: C.I. PIGMENT BLUE 28

CAS No: 006846-50-0

Name: TRIMETHYL-1,3-PENTANEDIOL DIISOBUTYRATE, 2,2,4-C16H30O4

CAS No: 026471-62-5

Name: BENZENE, 1,3-DIISOCYANATOMETHYL

CAS No: 027253-31-2

Name: NEODECANOIC ACID, COBALT SALT

CAS No: 028182-81-2

Name: DIISOCYANATE,1-6-HEXAMETHYLENE

CAS No: 041556-26-7

Name: BIS(1,2,2,6,6-PENTAMETHYL-4-PIPERIDYL) SEBACATE

CAS No: 053317-61-6

Name: 1,3-PROPANEDIOL, 2-ETHYL-2-(HYDROXYMETHYL)-,



POLYMER...

CAS No: 082919-37-7

Name: DECANEDIOIC ACID, 1-METHYL
10-(1,2,2,6,6-PENTAMETHYL-4-PIPERIDINYL)...

CAS No: 085711-55-3

Name: FATTY ACIDS, TALL-OIL, COMPDS. WITH OLEYLAMINE

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: POLY(OXY-1,2-ETHANEDIYL),
.ALPHA.-[3-[3-(2H-BENZOTRIAZOL-2-YL)-5-...

**Condition 34: Malfunctions and start-up/shutdown activities
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 201-1.4

Item 34.1:

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

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

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



contaminants, and an estimate of the emission rates.

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

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

**Condition 35: Emission Unit Definition
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 35.1:

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

Emission Unit: 0-00001

Emission Unit Description:

This emission unit contains all operations in building B-01, and only building B-01, consisting of approximately 12 different processes. In general the operations include manufacturing with styrene and methyl methacrylate gel coat materials applied by non-atomized spray equipment and resins applied by hand and resin transfer molding (RTM). Processes also include mold preparation, grinding, trimming, drilling, surface coating via high volume low pressure (HVLP) atomized spray equipment, bonding and other related processes. Most, but not all, VOC and HAP emissions will be directed through a Regenerative Thermal Oxidizer (RTO) for destruction of the VOCs and HAPs. This emission unit consists of five emission points labeled EF-01, EF-02, EF-03, EF-04 and EF-05. There are also several fugitive emission areas. Reference BFG-PFD-1.

Building(s): B-01

**Condition 36: Renewal deadlines for state facility permits
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 36.1:

The owner or operator of a facility having an issued state facility 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.

Condition 37: Compliance Demonstration



Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 37.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 37.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The source owner or operator shall submit an initial compliance report of any required monitoring within 180 days of startup. All instances of deviations from permit requirements must be clearly identified. The report must be certified by the responsible official for this facility.

Source owner or operator must 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 shorter time frame for reporting deviations, that definition or time frame shall govern.

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.

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 this 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 180-day reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in this report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

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After the initial 180-day compliance reporting period all reporting shall revert back to that specified in the various permit conditions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 38: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 38.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 38.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 5
232 Golf Course Rd.
Warrensburg, NY 12885

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 39: Visible Emissions Limited
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 211.2

Item 39.1:

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

Condition 40: Compliance Demonstration
Effective for entire length of Permit

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

Item 40.1:



The Compliance Demonstration activity will be performed for the Facility.

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

Item 40.2:

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. RTO destruction efficiency may only be applied to emissions calculations when the required destruction temperature is achieved. 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

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 41: Compliance Demonstration
Effective for entire length of Permit**

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

Item 41.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 026471-62-5 BENZENE, 1,3-DIISOCYANATOMETHYL
CAS No: 028182-81-2 DIISOCYANATE,1-6-HEXAMETHYLENE
CAS No: 053317-61-6
1,3-PROPANEDIOL, 2-ETHYL-2-(HYDROXYMETHYL)-, POLYMER...
CAS No: 000822-06-0 HEXANE, 1,6-DIISOCYANATO-

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Facility DEC ID: 5094200494



Item 41.2:

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.

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

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 42: Compliance Demonstration
Effective for entire length of Permit**

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

Item 42.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001

Process: P01

Emission Source: 00003

Emission Unit: 0-00001

Process: P02

Emission Source: 00015

Emission Unit: 0-00001

Process: P03

Emission Source: 00016

Regulated Contaminant(s):

CAS No: 001309-64-4

ANTIMONY TRIOXIDE

CAS No: 001345-16-0

C.I. PIGMENT BLUE 28

CAS No: 027253-31-2

NEODECANOIC ACID, COBALT SALT

CAS No: 000136-52-7

HEXANOIC ACID, 2-ETHYL COBALT 2+

Item 42.2:

New York State Department of Environmental Conservation

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Facility DEC ID: 5094200494



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 limit, the source owner is required to submit an acceptable report of measured emissions at the Department's discretion.

Lower 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: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 43: Compliance Demonstration
Effective for entire length of Permit**

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

Item 43.1:

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

Emission Unit: 0-00001
Process: P09

Emission Unit: 0-00001
Process: P11

Item 43.2:

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: UPON REQUEST BY REGULATORY AGENCY

**** Emission Unit Level ****

Condition 44: Emission Point Definition By Emission Unit Effective for entire length of Permit

Applicable State Requirement:6 NYCRR Subpart 201-5



Item 44.1:

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

Emission Unit: 0-00001

Emission Point: EF-01
Height (ft.): 40 Diameter (in.): 54
NYTMN (km.): 4949.685 NYTME (km.): 617.624 Building: B-01

Emission Point: EF-02
Height (ft.): 24 Diameter (in.): 38
NYTMN (km.): 4949.697 NYTME (km.): 617.616 Building: B-01

Emission Point: EF-03
Height (ft.): 24 Diameter (in.): 50
NYTMN (km.): 4949.697 NYTME (km.): 617.616 Building: B-01

Emission Point: EF-04
Height (ft.): 40 Diameter (in.): 30
NYTMN (km.): 4949.697 NYTME (km.): 617.616 Building: B-01

Emission Point: EF-05
Height (ft.): 24 Diameter (in.): 12
NYTMN (km.): 4949.697 NYTME (km.): 617.616 Building: B-01

**Condition 45: Process Definition By Emission Unit
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 45.1:

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

Emission Unit: 0-00001

Process: P01 Source Classification Code: 3-05-016-50

Process Description:

Process P01 is a gel coat operation. Styrene-based catalyzed gel coats are applied to molds in this booth via non-atomized application techniques. Texture coats may also be applied to parts after they have been molded via non-atomized application equipment. The booth is approximately 14 feet wide by 30 feet deep, exhausting approximately 10,800 CFM. Capture efficiency at sources will be 100% as defined by a 'total enclosure'. The booth contains exhausts filters 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 and then moved to either the hand lamination area or the resin transfer molding (RTM) area.

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.

The exhaust from this application area will be directed to the thermal oxidizer (RTO) for VOC destruction and then exit to the atmosphere through a 40 foot high exhaust stack. Recordkeeping will be maintained which will verify that the RTO is operating at the certified destruction temperature when VOC containing materials are being applied. The discharge emission point for process P01 will be through EF-01.

Emission Source/Control: 00001 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00003 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: 00002 - Process
Design Capacity: 3 pounds per minute

Item 45.2:

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

Emission Unit: 0-00001

Process: P02

Source Classification Code: 3-05-016-50

Process Description:

Process P02 is a gel coat operation. Styrene-based catalyzed gel coats are applied in this booth via non-atomized application techniques. Texture coats may also be applied to parts after they have been molded via non-atomized application equipment. The booth is approximately 13 feet wide by 16 feet deep, exhausting approximately 13,000 CFM. Capture efficiency at sources will be 100% as defined by a 'total enclosure'. The booth contains exhausts filters 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 and then moved to either the hand lamination area or the resin transfer molding (RTM) area.

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.

The exhaust from this application area will be directed to the thermal oxidizer (RTO) for VOC destruction and then exit to the atmosphere through a 40 foot high exhaust stack. Recordkeeping will be maintained which will verify that the RTO is operating at the certified destruction temperature when VOC containing materials are being applied. The discharge emission point for process P02 will be through EF-01

Emission Source/Control: 00001 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00015 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: 00002 - Process
Design Capacity: 3 pounds per minute

Item 45.3:

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

Emission Unit: 0-00001

Process: P03

Source Classification Code: 3-05-016-50

Process Description:

Process P03 is a gel coat operation. Styrene-based catalyzed gel coats are applied in this booth via non-atomized application techniques. Texture coats may also be applied to parts after they have been molded via non-atomized application equipment. The booth is approximately 16 feet wide by 24 feet deep, exhausting approximately 16,000 CFM. Capture efficiency at sources will be 100% as defined by a 'total enclosure'. The booth contains exhausts filters 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 and then moved to either the hand lamination area or the resin transfer molding (RTM) area.

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.

The exhaust from this application area will be directed to the thermal oxidizer (RTO) for VOC destruction and then exit to the atmosphere through a 40 foot high exhaust stack. Recordkeeping will be maintained which will verify that the RTO is operating at the certified destruction temperature when VOC containing materials are being applied. The discharge emission point for process P03 will be through EF-01.

Emission Source/Control: 00001 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00016 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: 00002 - Process
Design Capacity: 3 pounds per minute

Item 45.4:

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

Emission Unit: 0-00001

Process: P04

Source Classification Code: 3-05-016-50

Process Description:

Process P04 is a resin layup operation. Styrene-based catalyzed resins and additives are applied in this area via hand application techniques. Manual lamination of resin is normally performed by what is known as 'bucket and brush' application technique. 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 or rolling the resin into glass fiber. The estimated maximum rate that resin can be applied is 275 pounds per hour of resin mixture.

The booth is approximately 18 feet wide by 98 feet deep, exhausting approximately 16,000 CFM. Capture efficiency of



VOCs will be 100% as defined by a 'total enclosure'. The hand application techniques utilized in this booth will result in no overspray and no particulate emissions. After the parts have adequately cured they are moved to a de-mold area where the production parts are removed from the molds. The molds are then transferred to the mold prep area and prepared for another production cycle.

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.

The exhaust from this application area will be directed to the thermal oxidizer (RTO) for VOC destruction and then exit to the atmosphere through a 40 foot high exhaust stack. Recordkeeping will be maintained which will verify that the RTO is operating at the certified destruction temperature when VOC containing materials are being applied. The discharge emission point for process P04 will be through EF-01.

Emission Source/Control: 00001 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00017 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: 00004 - Process

Item 45.5:

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

Emission Unit: 0-00001

Process: P05

Source Classification Code: 3-05-016-50

Process Description:

Process P05 is a resin layup operation. Styrene-based catalyzed resins and additives are applied in this area via Resin Transfer Molding (RTM). This process area has no discrete walls or ventilation, as emissions from RTM are very low (applicant estimates MMA and Styrene emissions at 1% by weight). Any VOC emissions will be considered fugitive and will leave the facility through other process exhaust systems.

In process P05, previously gel coated 2-part molds are laid up with fiberglass fabric, Kevlar and other similar inorganic materials. The molds are then closed and resin and other additives are pumped into the molds under vacuum assist to thoroughly saturate the fabric. Resin is generally mixed in 55-gallon drums and catalyzed as it is



pumped and vacuumed into the mold cavity. The estimated maximum rate that resin can be applied is 340 pounds per hour of resin mixture. This is based on four pumps operating simultaneously. (Currently only two pump operate simultaneously.) (the average weight of resin mix is 11.0 lbs/gal). The molds are left closed until the resin has adequately cured. The 2-part molds are then separated and the parts removed for further processing. The molds are then transferred to the mold prep area and prepared for another production cycle.

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: 00005 - Process

Item 45.6:

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

Emission Unit: 0-00001

Process: P06

Source Classification Code: 3-05-016-50

Process Description:

Process P06 is a mold preparation operation where molds are inspected for their adequacy for return to the gel coat operation. Periodically molds are repaired to eliminate scratches and chips. They are routinely cleaned and polished with VOC/HAP containing materials followed by application of a mold release agent, also containing VOC/HAP materials. Any VOC/HAP emissions will be considered fugitive and will leave the facility through other process exhaust systems. 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. After the molds are prepared they are moved to a staging area pending transfer to a gel coat operation.

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: 00006 - Process

Item 45.7:

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



Emission Unit: 0-00001

Process: P07

Source Classification Code: 3-05-016-50

Process Description:

Process P07 is a robotic parts trimming operation. After parts are removed from the mold they are routed to either a robotic or a manual trimming operation. In the robotic trimming operation parts are fixed to the bed of a computer numerically controlled (CNC) trimming machine. This operation is contained within a booth and all airborne particulate are routed to a cartridge dust collector. The cartridge dust collector has a particulate removal efficiency of 99.9% or greater. The exhaust from the dust collector exits through exhaust point EF-02 at a stack height of approximately 25 feet above finish floor elevation. There are no VOC or HAP emissions from this process.

After the parts are removed from the trim cell they are routed to either the bonding and assembly operation or the paint and cure operation for further work and/or packaging and shipping.

Emission Source/Control: 00007 - Control

Control Type: PAPER FILTER

Emission Source/Control: 00011 - Process

Item 45.8:

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

Emission Unit: 0-00001

Process: P08

Source Classification Code: 3-05-016-50

Process Description:

Process P08 is a manual parts trimming operation. After parts are removed from the mold they are routed to either a robotic or a manual trimming operation. In the manual trimming operation parts are trimmed by small handheld air operated tools. This operation is contained within a booth and all airborne particulate are routed to a cartridge dust collector. The cartridge dust collector has a particulate removal efficiency of 99.9% or greater. The exhaust from the dust collector exits through exhaust point EF-03 at a stack height of approximately 25 feet above the finished floor elevation. There are no VOC or HAP emissions from this process.

After the parts are removed from the trim cell they are routed to either the bonding and assembly operation or the paint and cure operation for further work and/or packaging and shipping.

Emission Source/Control: 00008 - Control



Control Type: PAPER FILTER

Emission Source/Control: 00012 - Process

Item 45.9:

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

Emission Unit: 0-00001

Process: P09

Source Classification Code: 3-05-016-50

Process Description:

Process P09 is a parts bonding and assembly operation. This process area has no discrete walls or ventilation, as emissions from bonding are very low. Parts entering this operation are either 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. The usage rate of Bonding and Assembly materials is based upon experience. VOC and HAP emissions will be considered fugitive and will leave the facility 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.

Emission Source/Control: 00009 - Process

Item 45.10:

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

Emission Unit: 0-00001

Process: P10

Source Classification Code: 3-05-016-50

Process Description:

Process P10 is a painting operation (surface coating) for plastic parts. The booth is approximately 16 feet wide by 46 feet deep including the cure area, which is located adjacent to the paint booth. The exhaust from the paint booth is approximately 12,000 CFM. The paint booth contains exhaust filters for particulate control. The filters have an approximate 99.6% removal efficiency as



tested on atomized paint. Emissions from the paint application and paint cure area exit through emission point EF-04.

Paint is applied via HVLP (High Volume Low Pressure) atomized spray equipment. The spray guns utilized are gravity fed cup guns with a cup capacity of approximately 10 fluid ounces. 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. All VOCs and HAPs are assumed to be emitted to the atmosphere.

Integral with the paint booth is a low temperature natural gas fired heater used to warm and recirculate air in the curing portion of the booth. The net exhaust from the curing booth is 2000 CFM. Materials applied in this paint booth contain both VOCs and HAPs.

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.

There will be no designated emission point for combustion sources as all emissions are considered fugitive.

Emission Source/Control: 00013 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: 00010 - Process

Item 45.11:

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

Emission Unit: 0-00001
Process: P11 Source Classification Code: 3-05-016-50
Process Description:
Process 11 P11 Non-compliant VOC Adhesives
FINISH DESCRIPTION

Emission Source/Control: 00001 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 00017 - Control
Control Type: FIBERGLASS FILTER

Emission Source/Control: 00004 - Process



Item 45.12:

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

Emission Unit: 0-00001

Process: P12

Source Classification Code: 3-05-016-50

Process Description:

Process P 12 [Exempt Activity 201-3.2(c)(42)(43) is materials mixing operation contained in a booth like enclosure near the production area of the facility. The booth is ventilated only for safety purposes to the emission point EF-05. All VOC and HAP containing containers are kept closed except for when adding or removing materials. Emissions from this operation are considered negligible, but shall be included along with emissions from all other exempt sources towards emission cap limits.

Emission Source/Control: 00014 - Process

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

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

Item 46.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 46.2:

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

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Facility DEC ID: 5094200494



Averaging Method: ANNUAL TOTAL

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 47: Compliance Demonstration
Effective for entire length of Permit

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

Item 47.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 47.2:

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.

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

