PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 5-1708-00038/00043
Mod 0 Effective Date: 08/01/2017 Expiration Date: 07/31/2022
Mod 1 Effective Date: 12/14/2017 Expiration Date: 07/31/2022
Mod 2 Effective Date: 12/26/2018 Expiration Date: 07/31/2022

Permit Issued To: PEARL LEATHER FINISHERS INC
11 INDUSTRIAL PARK RD #21
JOHNSTOWN, NY 12095

Contact: JOHN RUGGIERO
PEARL LEATHER FINISHERS INC
11-21 INDUSTRIAL PARK
JOHNSTOWN, NY 12095
(518) 762-4543

Facility: PEARL LEATHER FINISHERS INC
11-21 INDUSTRIAL PARK
JOHNSTOWN, NY 12095

Description:
Pearl Leather Finishers, Inc. is an existing facility at which leather finishing (surface coating) activities are performed. The leather finishing is accomplished at four surface coating lines, consisting of spray booths & dryers. Emissions from surface coating activities pass through water curtains (at the spray stations) prior to being exhausted to the atmosphere. The dryer units utilize natural gas fired heaters. Various exempt and trivial activities also occur at the facility, including laboratory operations, R&D test spray booths, and buffing and tumbling of leather at various locations throughout the facility.

The facility consists of one regulated emission unit (i.e., F-INISH), which includes four leather finishing operations (i.e., Process IDs 101, 102, 103 and 104). Facility-wide emissions of Volatile Organic Compounds (VOCs) are limited to no more than 49.6 tons in any consecutive 12-month period, rolled monthly, in order to cap the facility out of 6 NYCRR Part 232-2. In addition, facility-wide emissions of N,N-Diethyl Ethanamine are limited to 6,500 pounds in any consecutive 12-month period, rolled monthly, to avoid additional control requirements under 6 NYCRR Part 212. Similarly, hexamethylene diisocyanate is precluded from use and dimethyl amino ethanol is limited to less than 3400 lb/yr.
Facility DEC ID: 5170800038

Emission Unit F-INISH is primarily regulated under the provisions of 6 NYCRR Part 228 and 40 CFR Part 63, Subpart TTTT, which limit the amount of VOC allowed in the coatings used and Hazardous Air Pollutants (HAPs) emitted per amount of leather processed, respectively. Emissions from the facility include: Particulates, Sulfur Dioxide, Oxides of Nitrogen, Carbon Monoxide, Volatile Organic Compounds and Hazardous Air Pollutants.

The facility is classified as a major source of air emissions due to a prior increase in production. An increase in the hours of operation in the year 2000 caused an increase in the facility’s potential to emit VOCs of 49.5 tons over the baseline emissions from 1998-1999, resulting in the 97 ton cap noted above.

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: BETH A MAGEE
NYSDEC - WARRENSBURG SUBOFFICE
232 GOLF COURSE RD
WARRENSBURG, NY 12885-1172

Authorized Signature: _____________________________ Date: ___ / ___ / _____

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
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 ****

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:
The permittee must submit a 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 the expiration of permits for Title V and State Facility Permits.

Item 3.3
Permits are transferrable with the approval of the department unless specifically prohibited by
the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 1-1:** Applications for permit renewals, modifications and transfers

**Applicable State Requirement:** 6 NYCRR 621.11

**Item 1-1.1:**
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 1-1.2:**
The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

**Item 1-1.3**
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

DEC Permit Conditions
Renewal 3/Mod 2/FINAL
Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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11 INDUSTRIAL PARK RD #21
JOHNSTOWN, NY 12095

Facility: PEARL LEATHER FINISHERS INC
11-21 INDUSTRIAL PARK
JOHNSTOWN, NY 12095

Authorized Activity By Standard Industrial Classification Code:
3111 - LEATHER TANNING AND FINISHING

Mod 0 Permit Effective Date: 08/01/2017  Permit Expiration Date: 07/31/2022
Mod 1 Permit Effective Date: 12/14/2017  Permit Expiration Date: 07/31/2022
Mod 2 Permit Effective Date: 12/26/2018  Permit Expiration Date: 07/31/2022
LIST OF CONDITIONS

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EU=F-INISH

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Facility Level
37  ECL 19-0301: Contaminant List
38  6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
26  6 NYCRR 211.1: Air pollution prohibited

NOTE: * preceding the condition number indicates capping.
FEDERALLY ENFORCEABLE CONDITIONS

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (a) (4)
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and
Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)

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

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

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

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

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

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

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

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

ii. The liability of a permittee of the Title V
facility for any violation of applicable requirements prior to or at the time of permit issuance;

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

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

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

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the department pursuant to the provisions of section 201-6.6 of this Subpart.

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

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

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

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

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

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

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

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

Condition 1: Acceptable Ambient Air Quality

Effective between the dates of 08/01/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR 200.6

Item 1.1:

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

**Condition 2:** Fees  
Effective between the dates of 08/01/2017 and 07/31/2022  

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

**Item 2.1:**  
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

**Condition 3:** Recordkeeping and Reporting of Compliance Monitoring  
Effective between the dates of 08/01/2017 and 07/31/2022  

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

**Item 3.1:**  
The following information must be included in any required compliance monitoring records and reports:

(i) The date, place, and time of sampling or measurements;

(ii) The date(s) analyses were performed;

(iii) The company or entity that performed the analyses;

(iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;

(v) The results of such analyses including quality assurance data where required; and

(vi) The operating conditions as existing at the time of sampling or measurement.

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

**Condition 4:** Records of Monitoring, Sampling, and Measurement  
Effective between the dates of 08/01/2017 and 07/31/2022  

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

**Item 4.1:**  
Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all
Permit ID: 5-1708-00038/00043         Facility DEC ID: 5170800038

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reports required by the permit.

**Condition 5: Compliance Certification**

**Effective between the dates of 08/01/2017 and 07/31/2022**

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

**Item 5.1:**
The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

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

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

1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

3) For all other deviations from permit requirements,
the report shall be contained in the 6 month monitoring report required above.

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

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

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

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

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual
report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

**Condition 6: Compliance Certification**
Effective between the dates of 08/01/2017 and 07/31/2022

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

**Item 6.1:**
The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

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

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

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

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

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

The address for the RAPCE is as follows:

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

The address for the BQA is as follows:

NYSDEC
Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**

**Effective between the dates of 08/01/2017 and 07/31/2022**

**Applicable Federal Requirement:** 6 NYCRR 202-2.1

**Item 7.1:**
The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**
Compliance Certification shall include the following monitoring:

- **Monitoring Type:** RECORD KEEPING/MAINTENANCE PROCEDURES
- **Monitoring Description:**
  Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

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

**Condition 8: Recordkeeping requirements**

**Effective between the dates of 08/01/2017 and 07/31/2022**

**Applicable Federal Requirement:** 6 NYCRR 202-2.5

**Item 8.1:**
(a) The following records shall be maintained for at least five years:

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

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

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

**Condition 9: Open Fires - Prohibitions**

**Effective between the dates of 08/01/2017 and 07/31/2022**

**Applicable Federal Requirement:** 6 NYCRR 215.2
Item 9.1:
Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 9.2
Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:
(a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
(b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
(c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
(d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
(e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
(f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
(g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
(h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
(i) Prescribed burns performed according to Part 194 of this Title.
(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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

The following federally enforceable permit conditions are mandatory for all
Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment  
Effective between the dates of 08/01/2017 and 07/31/2022  
Applicable Federal Requirement: 6 NYCRR 200.7

Item 10.1:  
Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage  
Effective between the dates of 08/01/2017 and 07/31/2022  
Applicable Federal Requirement: 6 NYCRR 201-1.7

Item 11.1:  
Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air  
Effective between the dates of 08/01/2017 and 07/31/2022  
Applicable Federal Requirement: 6 NYCRR 201-1.8

Item 12.1:  
No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 13: Exempt Sources - Proof of Eligibility  
Effective between the dates of 08/01/2017 and 07/31/2022  
Applicable Federal Requirement: 6 NYCRR 201-3.2 (a)

Item 13.1:  
The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 14: Trivial Sources - Proof of Eligibility  
Effective between the dates of 08/01/2017 and 07/31/2022
Applicable Federal Requirement: 6 NYCRR 201-3.3 (a)

Item 14.1:
The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 15:  Requirement to Provide Information
Effective between the dates of 08/01/2017 and 07/31/2022

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

Item 15.1:
The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16:  Right to Inspect
Effective between the dates of 08/01/2017 and 07/31/2022

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

Item 16.1:
The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

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

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

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

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

Condition 17:  Off Permit Changes
Effective between the dates of 08/01/2017 and 07/31/2022
Applicable Federal Requirement: 6 NYCRR 201-6.4 (f) (6)

Item 17.1:
No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

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

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

Condition 18: Required Emissions Tests
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR 202-1.1

Item 18.1:
For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 19: Accidental release provisions.
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable Federal Requirement: 40 CFR Part 68

Item 19.1:
If a chemical is listed in Tables 1, 2, 3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1, 2, 3 or 4, the following requirements will apply:

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

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 20: Recycling and Emissions Reduction
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable Federal Requirement: 40 CFR 82, Subpart F

Item 20.1:
The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 21: Emission Unit Definition
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 21.1 (From Mod 2):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: F-INISH
Emission Unit Description:
Leather finishing operations including four (4) roll coaters, ten (10) water wash control devices, fourteen (14) spray booths, and thirty (31) emission points.

Building(s): 01
02
03
04

Condition 22: Progress Reports Due Semiannually
Effective between the dates of 08/01/2017 and 07/31/2022

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

Item 22.1:
Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

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

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

**Condition 23: Facility Permissible Emissions**
Effective between the dates of 08/01/2017 and 07/31/2022

**Applicable Federal Requirement:** 6 NYCRR Subpart 201-7

**Item 23.1:**
The sum of emissions from the emission units specified in this permit shall not equal or exceed the following Potential To Emit (PTE) rate for each regulated contaminant:

<table>
<thead>
<tr>
<th>Name</th>
<th>CAS No</th>
<th>PTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>FORMALDEHYDE</td>
<td>000050-00-0 (From Mod 2)</td>
<td>100 pounds per year</td>
</tr>
<tr>
<td>2,2,2-NITRILOTRIS ETHANOL</td>
<td>000102-71-6 (From Mod 2)</td>
<td>15,700 pounds per year</td>
</tr>
<tr>
<td>2-DIMETHYL AMINO ETHANOL</td>
<td>000108-01-0 (From Mod 2)</td>
<td>34,000 pounds per year</td>
</tr>
<tr>
<td>N,N-DIETHYL ETHANAMINE</td>
<td>000121-44-8 (From Mod 2)</td>
<td>6,500 pounds per year</td>
</tr>
<tr>
<td>ACETAMIDE, N-(2-HYDROXYETHYL)-</td>
<td>000822-06-0 (From Mod 2)</td>
<td>0.001 pounds per year</td>
</tr>
<tr>
<td>HEXANE, 1,6-DIISOCYANATO-</td>
<td>007439-92-1 (From Mod 2)</td>
<td>5 pounds per year</td>
</tr>
</tbody>
</table>

**Condition 1-1: Capping Monitoring Condition**
Effective between the dates of 12/14/2017 and 07/31/2022
Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 1-1.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 212-2.3 (b)

Item 1-1.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-1.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 1-1.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-1.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-1.6:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: F-INISH
Regulated Contaminant(s):
CAS No: 000142-26-7 ACETAMIDE, N-(2-HYDROXYETHYL)-

Item 1-1.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
N-(2-hydroxyethyl)acetamide emissions from all facility operations will be limited to less than 23,500 pounds
during all consecutive 12-month periods. Monthly inventories must be conducted to determine chemical usage on a 12-month, rolled monthly, basis. N-(2-hydroxyethyl)acetamide emissions will be calculated on the assumption that all of it is emitted to the atmosphere.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: COATING MIXED  
Parameter Monitored: ACETAMIDE, N-(2-HYDROXYETHYL)-  
Upper Permit Limit: 23500 pounds per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period. The initial report is due 1/30/2018. Subsequent reports are due every 12 calendar month(s).

**Condition 1-2: Capping Monitoring Condition**  
**Effective between the dates of 12/14/2017 and 07/31/2022**  
**Applicable Federal Requirement:** 6 NYCRR Subpart 201-7

**Item 1-2.1:** 
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 212-2.3 (b)

**Item 1-2.2:** 
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 1-2.3:**  
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Item 1-2.4:**  
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 1-2.5:**  
The emission of pollutants that exceed the applicability thresholds for an applicable requirement,
for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 1-2.6:**
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

- **Emission Unit:** F-INISH
- **Regulated Contaminant(s):**
  - CAS No: 000149-57-5 2-ETHYLHEXANOIC ACID

**Item 1-2.7:**
Compliance Certification shall include the following monitoring:

- **Capping:** Yes
- **Monitoring Type:** WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
- **Monitoring Description:** Ethyl Hexanoic emissions from all facility operations will be limited to less than 15,700 pounds during all consecutive 12 month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month, rolled monthly, basis. Ethyl Hexanoic emissions will be calculated on the assumption that it is all emitted to the atmosphere.

**Work Practice Type:** PARAMETER OF PROCESS MATERIAL  
**Process Material:** COATING MIXED  
**Parameter Monitored:** 2-ETHYLHEXANOIC ACID  
**Upper Permit Limit:** 15700 pounds per year  
**Monitoring Frequency:** MONTHLY  
**Averaging Method:** ANNUAL MAXIMUM ROLLED MONTHLY  
**Reporting Requirements:** ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2018.  
Subsequent reports are due every 12 calendar month(s).

**Condition 1-3: Capping Monitoring Condition**  
**Effective between the dates of 12/14/2017 and 07/31/2022**  
**Applicable Federal Requirement:** 6 NYCRR Subpart 201-7

**Item 1-3.1:**
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 212-2.2

**Item 1-3.2:**
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 1-3.3:**
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Item 1-3.4:**
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 1-3.5:**
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 1-3.6:**
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

<table>
<thead>
<tr>
<th>CAS No</th>
<th>FORMALDEHYDE</th>
</tr>
</thead>
</table>

**Item 1-3.7:**
Compliance Certification shall include the following monitoring:

- **Capping:** Yes
- **Monitoring Type:** WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
- **Monitoring Description:**
  - Emissions of formaldehyde from all sources including coatings and combustion is limited to less than 100.0 pounds per year in order to comply with 6 NYCRR 212-2.2 Table 2.
- **Work Practice Type:** PROCESS MATERIAL THRUPUT
- **Process Material:** COATING
- **Upper Permit Limit:** 100.0 pounds per year
- **Monitoring Frequency:** MONTHLY
- **Averaging Method:** 12 MONTH AVERAGE - ROLLED MONTHLY
- **Reporting Requirements:** SEMI-ANNUALLY (CALENDAR)
- Reports due 30 days after the reporting period.
  - The initial report is due 1/30/2018.
  - Subsequent reports are due every 6 calendar month(s).

**Condition 1-4:** Capping Monitoring Condition
Effective between the dates of 12/14/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 1-4.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 212-2.2

Item 1-4.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-4.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 1-4.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-4.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-4.6:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 007439-92-1 LEAD

Item 1-4.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
Emissions of lead is limited to less than 5.0 pounds per year from all coating and combustion sources in order to comply with 6 NYCRR 212-2.2 Table 2.
Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: COATING
Upper Permit Limit: 5.0 pounds per year
Monitoring Frequency: MONTHLY
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 1-5: Capping Monitoring Condition
Effective between the dates of 12/14/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 1-5.1:
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 212-2.3 (b)

Item 1-5.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-5.3:
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 1-5.4:
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 1-5.5:
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 1-5.6:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:
Emission Unit: F-INISH

Regulated Contaminant(s):
CAS No: 000108-01-0  2-DIMETHYL AMINO ETHANOL

Item 1-5.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
Dimethyl Amino Ethanol emissions from all facility operations will be limited to less than 34,000 pounds during all consecutive 12month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month, rolled monthly, basis. Dimethyl Amino Ethanol emissions will be calculated on the assumption that all Dimethyl Amino Ethanol used at the facility is emitted to the atmosphere.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING MIXED
Parameter Monitored: 2-DIMETHYL AMINO ETHANOL
Upper Permit Limit: 34000  pounds per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

Condition 1-6: Capping Monitoring Condition
Effective between the dates of 12/14/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 1-6.1:
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 212-2.3 (b)

Item 1-6.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-6.3:
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 1-6.4:**
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 1-6.5:**
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 1-6.6:**
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: F-INISH

Regulated Contaminant(s):
- CAS No: 000822-06-0 HEXANE, 1,6-DIISOCYANATO-

**Item 1-6.7:**
Compliance Certification shall include the following monitoring:

- Capping: Yes
- Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
- Monitoring Description: Hexamethyamine diisocyanate usage is prohibited in all coatings and solvents used at this facility.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING MIXED
Parameter Monitored: HEXANE, 1,6-DIISOCYANATO-
Upper Permit Limit: 0 pounds per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

**Condition 1-7:** Capping Monitoring Condition
Effective between the dates of 12/14/2017 and 07/31/2022

**Applicable Federal Requirement:** 6 NYCRR Subpart 201-7
Item 1-7.1: 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 212-2.3 (b)

Item 1-7.2: Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-7.3: 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 1-7.4: 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 1-7.5: 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 1-7.6: The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

- Emission Unit: F-INISH
- Regulated Contaminant(s):
  - CAS No: 000102-71-6 2,2,2-NITRILOTRIS ETHANOL

Item 1-7.7: Compliance Certification shall include the following monitoring:

- Capping: Yes
- Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
- Monitoring Description: Triethanolamine emissions from all facility operations will be limited to less than 15,700 pounds during all consecutive 12month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month,
rolled monthly, basis. Triethanolamine emissions will be calculated on the assumption that all Triethanolamine used at the facility is emitted to the atmosphere.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING MIXED
Parameter Monitored: 2,2,2-NITRILOTRIS ETHANOL
Upper Permit Limit: 15700 pounds per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

Condition 1-8: Capping Monitoring Condition
Effective between the dates of 12/14/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Replaces Condition(s) 25

Item 1-8.1:
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 Subpart 231-6

Item 1-8.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-8.3:
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 1-8.4:
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 1-8.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.
Item 1-8.6:
The Compliance Certification activity will be performed for the Facility.

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

Item 1-8.7:
Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
Emissions from all coating and solvent usage at the facility, including exempt & trivial sources, will be limited as follows:

Total VOCs less than or equal to 49.0 tons per year.

This limit applies during all consecutive 12-month periods. Monthly inventories must be conducted to determine coating and solvent usage on a 12 month (rolled monthly) basis. Records of the VOC makeup of all coatings and solvents shall be maintained at the facility. Calculations will assume that all VOC used is emitted from the facility. This limit will allow for the use of all on-site spray booths and driers under the operational flexibility plan provided under 201-6.4(f)(6) without having to consider possible New Source Review (NSR) applicability. New coatings may be used under this provision as long as they do not contain any new contaminants that are Hazardous Air Pollutants, High Toxic Air Contaminants (as defined in 6 NYCRR 212-1.2(9)), or have an AGC of < 75 ug/m3 or an SGC of < 386 ug/m3. If an AGC or SGC is not already determined in DAR-1 (the AG-1 tab of the emissions spreadsheet) then DEC must first be consulted prior to beginning use of the new coating.

Note that the PTE from all combustion sources at this facility are 0.574 tons per year VOC and 0.000052 tons per year Total HAPs. Therefore, the above limit on coating and solvent usage will keep the facility’s PTE below the NSR Threshold for VOCs.

Note: The contemporaneous emissions of VOC are 21.92 tons per year (2014 - 2015). The existing VOC cap, prior to this modification, was 97.09 tpy.

Note: Records required for the VOC calculations are detailed in condition # 32 - citation 6 NYCRR
Condition 24:  Capping Monitoring Condition
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 24.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 212-2.3 (b)

Item 24.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 24.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 24.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 24.5:
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 24.6:  
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
    CAS No: 000121-44-8   N,N-DIETHYL ETHANAMINE

Item 24.7:  
Compliance Certification shall include the following monitoring:

    Capping: Yes
    Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
    Monitoring Description:
    N,N-Diethyl Ethanamine emissions from all facility operations will be limited to less than 6,500 pounds during all consecutive 12-month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month, rolled monthly, basis. N,N-Diethyl Ethanamine emissions will be calculated on the assumption that all N,N-Diethyl Ethanamine used at the facility is emitted to the atmosphere.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING MIXED
Parameter Monitored: N,N-DIETHYL ETHANAMINE
Upper Permit Limit: 6500 pounds per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

Condition 2-1:   Visible Emissions Limited
Effective between the dates of 12/26/2018 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR 211.2

Item 2-1.1:  
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 27:   Compliance Certification
Effective between the dates of 08/01/2017 and 07/31/2022

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

Item 27.1:  
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: F-INISH

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

Item 27.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications daily. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Upper Permit Limit: 0.05 grains per dscf
Reference Test Method: Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 28: Compliance Certification
Effective between the dates of 08/01/2017 and 07/31/2022

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

Item 28.1:
The Compliance Certification activity will be performed for the Facility.

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

Item 28.2:
Compliance Certification shall include the following monitoring:

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

Monitoring Description:
No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). Observations must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:
- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam – see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions persist after corrections are made, the permittee will immediately notify the department and may be required to conduct a Method 9 assessment within 24 hours to determine the degree of opacity.
Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

** NOTE ** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 29: Surface Coating- Prohibitions**
Effective between the dates of 08/01/2017 and 07/31/2022

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

**Item 29.1:**

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.
**** Emission Unit Level ****

Condition 30: Emission Point Definition By Emission Unit
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 30.1(From Mod 2):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: F-INISH

Emission Point: 00001
   Height (ft.): 28  Diameter (in.): 31  
   NYTMN (km.): 4764.084  NYTME (km.): 552.615  Building: 01

Emission Point: 00003
   Height (ft.): 28  Diameter (in.): 31  
   NYTMN (km.): 4764.082  NYTME (km.): 552.625  Building: 01

Emission Point: 00004
   Height (ft.): 12  Diameter (in.): 31  
   NYTMN (km.): 4764.08  NYTME (km.): 552.635  Building: 01

Emission Point: 00005
   Height (ft.): 12  Diameter (in.): 31  
   NYTMN (km.): 4764.079  NYTME (km.): 552.644  Building: 01

Emission Point: 00006
   Height (ft.): 28  Diameter (in.): 31  
   NYTMN (km.): 4764.079  NYTME (km.): 552.651  Building: 01

Emission Point: 00007
   Height (ft.): 12  Diameter (in.): 31  
   NYTMN (km.): 4764.071  NYTME (km.): 552.615  Building: 01

Emission Point: 00008
   Height (ft.): 4  Diameter (in.): 28  
   NYTMN (km.): 4764.069  NYTME (km.): 552.62  Building: 01

Emission Point: 00009
   Height (ft.): 2  Diameter (in.): 28  
   NYTMN (km.): 4764.069  NYTME (km.): 552.627  Building: 02

Emission Point: 00010
   Height (ft.): 28  Diameter (in.): 31  
   NYTMN (km.): 4764.068  NYTME (km.): 552.635  Building: 02

Emission Point: 00011
   Height (ft.): 12  Diameter (in.): 31
NYTMN (km.): 4764.064  NYTME (km.): 552.649  Building: 02
Emission Point: 00012
Height (ft.): 12  Diameter (in.): 31

NYTMN (km.): 4764.065  NYTME (km.): 552.621  Building: 02
Emission Point: 00013
Height (ft.): 28  Diameter (in.): 31

NYTMN (km.): 4764.064  NYTME (km.): 552.627  Building: 02
Emission Point: 00014
Height (ft.): 10  Diameter (in.): 33

NYTMN (km.): 4764.061  NYTME (km.): 552.632  Building: 03
Emission Point: 00015
Height (ft.): 10  Diameter (in.): 33

NYTMN (km.): 4764.063  NYTME (km.): 552.638  Building: 03
Emission Point: 00016
Height (ft.): 28  Diameter (in.): 31

NYTMN (km.): 4764.059  NYTME (km.): 552.65  Building: 03
Emission Point: 00017
Height (ft.): 8  Diameter (in.): 31

NYTMN (km.): 4764.057  NYTME (km.): 552.656  Building: 03
Emission Point: 00018
Height (ft.): 28  Diameter (in.): 31

NYTMN (km.): 4764.057  NYTME (km.): 552.663  Building: 03
Emission Point: 00019
Height (ft.): 10  Diameter (in.): 31

NYTMN (km.): 4764.062  NYTME (km.): 552.61  Building: 04
Emission Point: 00020
Height (ft.): 8  Diameter (in.): 31

NYTMN (km.): 4764.064  NYTME (km.): 552.615  Building: 04
Emission Point: 00021
Height (ft.): 24  Diameter (in.): 31

NYTMN (km.): 4764.064  NYTME (km.): 552.649  Building: 04
Emission Point: 00022
Height (ft.): 12  Diameter (in.): 31

NYTMN (km.): 4764.058  NYTME (km.): 552.627  Building: 04
Emission Point: 00023
Height (ft.): 8  Diameter (in.): 33

NYTMN (km.): 4764.057  NYTME (km.): 552.644  Building: 04
Emission Point: 00024
Height (ft.): 8  Diameter (in.): 33
NYTMN (km.): 4764.057      NYTME (km.): 552.632  Building: 04

Emission Point: 00029
Height (ft.): 28      Diameter (in.): 31

NYTMN (km.): 4764.08      NYTME (km.): 552.652  Building: 03

Emission Point: 00030
Height (ft.): 28      Diameter (in.): 33

NYTMN (km.): 4764.057      NYTME (km.): 552.656  Building: 03

Emission Point: 00032
Height (ft.): 24      Diameter (in.): 31

NYTMN (km.): 4764.06      NYTME (km.): 552.615  Building: 04

Emission Point: 00033
Height (ft.): 7      Diameter (in.): 33

NYTMN (km.): 4764.059      NYTME (km.): 552.621  Building: 04

Condition 31: Process Definition By Emission Unit
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 31.1 (From Mod 2):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-INISH
Process: 101
Source Classification Code: 3-20-999-97

Process Description:
Leather finishing (surface coating) operation consisting of one (1) test spray booth, one (1) roll coater, three (3) spray booths and three (3) dryers.

Emission Source/Control: 0001C - Control
Control Type: WATER CURTAIN

Emission Source/Control: 0003C - Control
Control Type: WATER CURTAIN

Emission Source/Control: 0006C - Control
Control Type: WATER CURTAIN

Emission Source/Control: 00001 - Process

Emission Source/Control: 00003 - Process

Emission Source/Control: 00004 - Process

Emission Source/Control: 00005 - Process

Emission Source/Control: 00006 - Process
Emission Source/Control: 00007 - Process
Emission Source/Control: 00032 - Process
Emission Source/Control: 00034 - Process

Item 31.2 (From Mod 2):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-INISH
Process: 102 Source Classification Code: 3-20-999-97
Process Description:
leather finishing (surface coating) operation consisting of one (1) test spray booth, one (1) roll coater, two (2)
spray booths and three (3) dryers.

Emission Source/Control: 0010C - Control
Control Type: WATER CURTAIN
Emission Source/Control: 0013C - Control
Control Type: WATER CURTAIN
Emission Source/Control: 00008 - Process
Emission Source/Control: 00009 - Process
Emission Source/Control: 00010 - Process
Emission Source/Control: 00011 - Process
Emission Source/Control: 00013 - Process
Emission Source/Control: 00014 - Process

Item 31.3 (From Mod 2):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-INISH Source Classification Code: 3-20-999-97
Process: 103
Process Description:
Leather finishing (surface coating) operation consisting of one (1) test spray booth, one (1) roll coater, two (2)
water wash spray booths and three (3) dryers.

Emission Source/Control: 0019C - Control
Control Type: WATER CURTAIN
Emission Source/Control: 0022C - Control
Control Type: WATER CURTAIN
Emission Source/Control: 00015 - Process
Emission Source/Control: 00016 - Process
Emission Source/Control: 00017 - Process
Emission Source/Control: 00019 - Process
Emission Source/Control: 00020 - Process
Emission Source/Control: 00022 - Process
Emission Source/Control: 00023 - Process

**Item 31.4 (From Mod 2):**
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-INISH
Process: 104
Source Classification Code: 3-20-999-97

Process Description:
Leather finishing (surface coating) operation consisting of one (1) test spray booth, one (1) roll coater, two (2) spray booths and three (3) dryers.

Emission Source/Control: 0026C - Control
Control Type: WATER CURTAIN

Emission Source/Control: 0028C - Control
Control Type: WATER CURTAIN

Emission Source/Control: 00024 - Process
Emission Source/Control: 00025 - Process
Emission Source/Control: 00026 - Process
Emission Source/Control: 00027 - Process
Emission Source/Control: 00028 - Process
Emission Source/Control: 00029 - Process

**Condition 32:** 
**Compliance Certification**
Effective between the dates of 08/01/2017 and 07/31/2022

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

**Item 32.1:**
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH

**Item 32.2:**
Compliance Certification shall include the following monitoring:
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.

2. Purchase, usage and/or production records of each coating material, including solvents.

3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.

4. Records verifying each parameter used to calculate the 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 33: Compliance Certification
Effective between the dates of 08/01/2017 and 07/31/2022
Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

Item 33.1:
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH

Item 33.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart must:

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

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

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

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

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

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

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

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

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

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

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

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
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- corrective measures taken, if necessary.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

**Condition 34:** Compliance Certification
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable Federal Requirement: 6 NYCRR 228-1.4 (e) (2)

**Item 34.1:**
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH

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

**Item 34.2:**
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
The maximum permitted pounds of VOC per gallon (minus water and excluded VOC) of coating at application, for leather coating lines is 5.8

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING LINES
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 5.8 pounds per gallon
Monitoring Frequency: SINGLE OCCURRENCE
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

**Condition 35:** Compliance Certification
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable Federal Requirement: 40CFR 63, Subpart TTTT

**Item 35.1:**
The Compliance Certification activity will be performed for:
Emission Unit: F-INISH

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

**Item 35.2:**
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:
   Coating activities at the facility will result in less than 2.6 pounds of HAP loss per 1000 square feet of leather processed.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING
Parameter Monitored: TOTAL HAP
Upper Permit Limit: 2.6   pounds of HAP loss per 1000 square feet of leather processed

Monitoring Frequency: MONTHLY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 3/1/2018.
Subsequent reports are due every 6 calendar month(s).

**Condition 36: Compliance Certification**
Effective between the dates of 08/01/2017 and 07/31/2022

**Applicable Federal Requirement:** 40CFR 63, Subpart TTTT

**Item 36.1:**
The Compliance Certification activity will be performed for:

Emission Unit: F-INISH

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

**Item 36.2:**
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
   All affected sources must be in compliance with the requirements of this subpart at all times, including periods of startup, shutdown, and malfunction.

   1) Submit the necessary reports in accordance with §63.5420.
2) Keep a finish inventory log, as specified at §63.5335(b), to record monthly, the pounds of each type of finish applied for each leather product process operation and the mass fraction of HAP in each applied finish. Permittee may be required to start record keeping prior to the compliance dates specified at §63.5295.

3) Keep an inventory log, as specified at §63.5430(f), to record monthly, the surface area of leather processed in 1,000's of square feet for each product process operation. Permittee may be required to start record keeping prior to the compliance dates specified at §63.5295.

4) Determine the actual HAP loss from affected source in accordance with §63.5335.

5) Determine the allowable HAP loss for affected source in accordance with §63.5340.

6) Determine the compliance ratio for affected source each month as specified at §63.5330. The compliance ratio compares the actual HAP loss to the allowable HAP loss for the previous 12 months.

7) Maintain the compliance ratio for affected source at or below 1.00 in accordance with §63.5330.

8) Maintain all the necessary records which have been used to demonstrate compliance with this subpart in accordance with §63.5430.

Monitoring Frequency: MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 3/1/2018.
Subsequent reports are due every 6 calendar month(s).
STATE ONLY ENFORCEABLE CONDITIONS
**** Facility Level ****

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

Item A: Emergency Defense - 6 NYCRR 201-1.5
An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

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

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

Item B: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and
standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

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

Condition 37: Contaminant List
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable State Requirement:ECL 19-0301

Item 37.1: Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

- CAS No: 000050-00-0
  Name: FORMALDEHYDE

- CAS No: 000102-71-6
  Name: 2,2,2-NITRILOTRIS ETHANOL

- CAS No: 000108-01-0
  Name: 2-DIMETHYL AMINO ETHANOL

- CAS No: 000121-44-8
  Name: N,N-DIETHYL ETHANAMINE

- CAS No: 000142-26-7
  Name: ACETAMIDE, N-(2-HYDROXYETHYL)-

- CAS No: 000149-57-5
  Name: 2-ETHYLHEXANOIC ACID

- CAS No: 000822-06-0
  Name: HEXANE, 1,6-DIISOCYANATO-
CAS No: 007439-92-1
Name: LEAD

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

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

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

Condition 38: Malfunctions and start-up/shutdown activities
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable State Requirement: 6 NYCRR 201-1.4

Item 38.1:
(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 26:  Air pollution prohibited
Effective between the dates of 08/01/2017 and 07/31/2022

Applicable State Requirement: 6 NYCRR 211.1

Item 26.1:
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.