



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 5-5234-00007/00087  
Mod 0 Effective Date: 04/18/2007 Expiration Date: No expiration date.  
Mod 1 Effective Date: 05/29/2012 Expiration Date: No expiration date.

Permit Issued To: C R BARD INC  
289 BAY RD  
QUEENSBURY, NY 12804

Contact: JOHN GREENING  
C R BARD USCI DIV  
289 BAY RD  
QUEENSBURY, NY 12804  
(518) 793-2531

Facility: C R BARD USCI DIV  
289 BAY RD  
QUEENSBURY, NY 12804

Description:  
C R Bard is a manufacturer of medical devices such as catheters. Products are both developed and produced. Operations include receiving raw materials, weaving, coating, drying, cleaning and assembling catheters.

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: MARC S MIGLIORE  
NYSDEC  
232 GOLF COURSE RD  
WARRENSBURG, NY 12885

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 and Modifications
  - Permit modifications, suspensions or revocations by the Department
  - Permit modifications, suspensions or revocations by the Department
  - Permit Modifications, Suspensions and Revocations by the Department

#### Facility Level

- Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG
- Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG



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

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION



**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

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 4.2:**

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

**Item 4.3:**

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 5: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 5.1:**

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

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

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

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 1-1.1:**

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

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



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

**Item 6.1:**

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

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

**\*\*\*\* Facility Level \*\*\*\***

**Condition 7: Submission of application for permit modification or renewal-REGION 5**  
**SUBOFFICE - WARRENSBURG**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 7.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 5 Sub-office  
Division of Environmental Permits  
232 Golf Course Road, PO Box 220  
Warrensburg, NY 12885-0220  
(518) 623-1281

**Condition 1-2: Submission of application for permit modification or renewal-REGION 5**  
**SUBOFFICE - WARRENSBURG**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 1-2.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 5 Sub-office  
Division of Environmental Permits  
232 Golf Course Road  
Warrensburg, NY 12885-1172  
(518) 623-1281

**New York State Department of Environmental Conservation**

Permit ID: 5-5234-00007/00087

Facility DEC ID: 5523400007



**Permit Under the Environmental Conservation Law (ECL)**

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

**IDENTIFICATION INFORMATION**

Permit Issued To: C R BARD INC  
289 BAY RD  
QUEENSBURY, NY 12804

Facility: C R BARD USCI DIV  
289 BAY RD  
QUEENSBURY, NY 12804

Authorized Activity By Standard Industrial Classification Code:  
3841 - SURGICAL & MEDICAL INSTRUMENTS

Mod 0 Permit Effective Date: 04/18/2007  
date.

Permit Expiration Date: No expiration  
date.

Mod 1 Permit Effective Date: 05/29/2012  
date.

Permit Expiration Date: No expiration  
date.



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1-2 6 NYCRR 202-1.1: Required Emissions Tests
- 1-1 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 1-3 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- \*1-4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 1 6 NYCRR 201-7.2: Facility Permissible Emissions
- \*2 6 NYCRR 201-7.2: Capping Monitoring Condition
- \*3 6 NYCRR 201-7.2: Capping Monitoring Condition
- 1-5 6 NYCRR 211.1: Air pollution prohibited
- 5 6 NYCRR 212.6 (a): Compliance Demonstration
- 1-6 6 NYCRR 228-1.3: Compliance Demonstration
- 7 6 NYCRR 228-1.3 (e): Compliance Demonstration
- 8 6 NYCRR 228-1.4: Compliance Demonstration
- 9 6 NYCRR 228-1.10: Compliance Demonstration
- 1-7 40CFR 60, NSPS Subpart JJJJ: Applicability
- 10 40CFR 63.468(f), Subpart T: Compliance Demonstration

#### Emission Unit Level

##### EU=0-00001,Proc=BUC

- 12 40CFR 63.463, Subpart T: Batch vapor and In-line machines: base design requirements
- 1-8 40CFR 63.463(b)(1)(i), Subpart T: Compliance Demonstration

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 13 ECL 19-0301: Contaminant List
- 1-9 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 15 6 NYCRR Subpart 201-5: Emission Unit Definition
- 16 6 NYCRR 201-5.4: Compliance Demonstration
- 1-10 6 NYCRR 211.2: Visible Emissions Limited
- 18 6 NYCRR 212.4 (a): Compliance Demonstration

#### Emission Unit Level

- 19 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 20 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

**Item A: Sealing - 6 NYCRR 200.5**

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

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

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

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

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

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

**Item C: Maintenance of Equipment - 6 NYCRR 200.7**

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



required to operate such device effectively.

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

**Item K: Open Fires Prohibitions - 6 NYCRR 215.2**  
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item L: Permit Exclusion - ECL 19-0305**  
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item M: Federally Enforceable Requirements - 40 CFR 70.6 (b)**  
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 1-2: Required Emissions Tests**



**Effective between the dates of 05/29/2012 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 1-2.1:**

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 1-1: Non Applicable requirements**

**Effective between the dates of 05/29/2012 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (g)**

**Item 1-1.1:**

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

(From Mod 1) 6 NYCRR 228-1.1 (b)

Emission Unit: 000001 Process: LUT

Reason: The Lutonix coating is a low-use specialty coating limited to less than 55 gallons per year and not subject to the VOC content limits in Table 1. Records of low-use coatings usage must be maintained on an as used basis to demonstrate that the coating qualifies for this exemption.

**Condition 1-3: Facility Permissible Emissions**

**Effective between the dates of 05/29/2012 and Permit Expiration Date**

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

**Item 1-3.1:**

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

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

CAS No: 0NY998-00-0 (From Mod 1) PTE: 98,000 pounds  
per year

Name: VOC

**Condition 1-4: Capping Monitoring Condition**

**Effective between the dates of 05/29/2012 and Permit Expiration Date**

**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 201-6.1 (a)

**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 Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 1-4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility wide emissions of VOCs shall not exceed 49 tons per year (98,000 lbs per year) as determined by summing monthly VOC emissions during any 12 month period. This caps the facility below the Title V threshold and also caps the facility out of Part 228 Table 2 requirements.

Records shall be maintained on-site which demonstrate compliance with the VOC cap. These records shall include the mass emissions totaled over each month and the total

New York State Department of Environmental Conservation

Permit ID: 5-5234-00007/00087

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mass emissions over each rolling 12 month period. Calculations are based on records of all chemicals used at the facility, assuming that all VOCs contained in the chemicals are emitted minus the quantity removed from the facility as hazardous waste.

Parameter Monitored: VOC's
Upper Permit Limit: 49 tons 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 1/30/2013.
Subsequent reports are due every 12 calendar month(s).

Condition 1: Facility Permissible Emissions
Effective between the dates of 04/18/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 1.1:

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

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

CAS No: 000075-09-2 (From Mod 1) PTE: 19,000 pounds
per year

Name: DICHLOROMETHANE

CAS No: 0NY100-00-0 (From Mod 1) PTE: 49,000 pounds
per year

Name: HAP

Condition 2: Capping Monitoring Condition
Effective between the dates of 04/18/2007 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 2.1:

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

6 NYCRR 201-6.1 (a)

Item 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 2.3:

**New York State Department of Environmental Conservation**

Permit ID: 5-5234-00007/00087

Facility DEC ID: 5523400007



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 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 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 2.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000075-09-2      DICHLOROMETHANE

**Item 2.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility wide emissions of Methylene Chloride shall not exceed 9.5 tons per year (19,000 lbs per year) as determined by summing monthly emissions during any 12 month period. This caps the facility below the Title V threshold.

Records shall be maintained on-site which demonstrate compliance with the cap. These records shall include the mass emissions totaled over each month and the total mass emissions over each rolling 12 month period. Calculations are based on records of all chemicals used at the facility, assuming that all Methylene Chloride contained in the chemicals are emitted minus the quantity removed from the facility as hazardous waste.

Parameter Monitored: DICHLOROMETHANE

Upper Permit Limit: 9.5 tons 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 1/30/2008.  
Subsequent reports are due every 12 calendar month(s).

**Condition 3: Capping Monitoring Condition**  
**Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 201-7.2**

**Item 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 201-6.1 (a)

**Item 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 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 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 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 3.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 3.7:**

Compliance Demonstration shall include the following monitoring:

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



Monitoring Description:

Facility wide emissions of Hazardous Air Pollutants (HAPs) shall not exceed 24.5 tons per year (49,000 lbs per year) for total HAPs as determined by summing monthly HAP emissions during any 12 month period. This caps the facility below the Title V threshold.

Records shall be maintained on-site which demonstrate compliance with the HAP cap. These records shall include the mass emissions totaled over each month and the total mass emissions over each rolling 12 month period.

Calculations are based on records of all chemicals used at the facility, assuming that all HAPs contained in the chemicals are emitted minus the quantity removed from the facility as hazardous waste.

Parameter Monitored: HAP

Upper Permit Limit: 24.5 tons 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 1/30/2008.

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

**Condition 1-5: Air pollution prohibited**  
**Effective between the dates of 05/29/2012 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 1-5.1:**

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

**Condition 5: Compliance Demonstration**  
**Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 5.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00003

Emission Unit: 0-00004

Emission Unit: 0-00005

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**Item 5.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any emission source subject to this part. The Department reserves the right to perform or require the performance of a method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-6: Compliance Demonstration**

**Effective between the dates of 05/29/2012 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.3**

**Item 1-6.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001

Process: BHC

Emission Unit: 0-00001

Process: HDR

Emission Unit: 0-00001

Process: NAV

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-6.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The RACT demonstration submitted on January 26, 2012 stated that there is not a suitable compliant coating that can be used for products made with these sources. The current coatings may be used but these sources may only

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apply coatings using low emission application techniques such as die wiping or dip coating. This is considered RACT for these sources.

This demonstration must be reviewed and resubmitted every 5 years, beginning with January 1, 2017. If emissions from these processes reach 5 tons per year, a new demonstration must immediately be submitted which also addresses the feasibility of using add-on control devices.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 7: Compliance Demonstration**  
**Effective between the dates of 04/18/2007 and Permit Expiration Date**

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

**Item 7.1:**

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

Emission Unit: 0-00001	
Process: BHC	Emission Source: BHCOT
Emission Unit: 0-00001	
Process: HDR	Emission Source: HYDRO
Emission Unit: 0-00001	
Process: NAV	Emission Source: UC-CP
Regulated Contaminant(s):	
CAS No: 0NY998-00-0	VOC

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Total VOC emissions for these processes shall not exceed 5 tons per year. Records shall be maintained on-site which demonstrate compliance with the VOC limit. These records shall include the mass emissions totaled over each month and the total mass emissions over each rolling 12 month period. Calculations are based on records of all chemicals used in these sources, assuming that all VOCs contained in the chemicals are emitted minus the quantity removed from the facility as hazardous waste.

Facilities with surface coating processes subject to Part 228 with an annual potential to emit less than five tons

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of VOCs will only be required to comply with subparagraphs 28.3(e)(1) (i) and (iv) in order to demonstrate that a lesser degree of control is RACT for these processes.

Monitoring Frequency: MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2008.  
Subsequent reports are due every 12 calendar month(s).

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.4**

**Item 8.1:**

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

Emission Unit: 0-00001

Emission Unit: 0-00002

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any emission source subject to this part. The Department reserves the right to perform or require the performance of a method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.10**

**Item 9.1:**

The Compliance Demonstration activity will be performed for the Facility.



**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No owner or operator of a facility subject to 6NYCRR Part 228 shall:

- (a) Use open containers to store or dispose of cloth or paper impregnated with VOC and /or solvents that are used for surface preparation, cleanup, or coating removal.
- (b) Use open containers to store or dispose of spent or fresh VOC and/or solvents or that are used for surface preparation, cleanup, or coating removal.
- (c) Use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.
- (d) Use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device designed for applying a coating 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) Use open containers to store or dispose of spent surface coatings or spent VOC solvents.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-7: Applicability**

**Effective between the dates of 05/29/2012 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60, NSPS Subpart JJJJ**

**Item 1-7.1:**

Facilities that have stationary spark ignition internal combustion engines must comply with applicable portions of 40 CFR 60 subpart JJJJ.

**Condition 10: Compliance Demonstration**

**Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 63.468(f), Subpart T**

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**Item 10.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of 40CFR63.463 shall submit an annual report by February 1 of the year following the one for which the reporting is being made. The report shall include the following:

- (1) A signed statement from the facility owner or his designee stating that " All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40CFR63.463(d)(10)."
- (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

**Condition 12: Batch vapor and In-line machines: base design requirements Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 63.463, Subpart T**

**Item 12.1:**

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

**Item 12.2:**

Base Design Requirements. All Batch vapor and in-line machines complying with either the control combinations or the idling emission limit must be equipped with the following:

1. Either an idling mode cover or reduced room draft.
2. A freeboard ratio of 0.75 or greater.



3. Automated parts handling system which moves parts or parts baskets at a speed of 3.4 meters per minute or less.

4. Vapor cleaning machines shall be equipped with automatic shutoff if the sump liquid solvent level drops to the sump heater coils.

5. Vapor cleaning machines shall be equipped with automatic shutoff if the vapor level rises above the primary condenser.

6. Vapor machines shall have a primary condenser.

7. Cleaning machines with a lip exhaust shall use a carbon adsorber to control emissions.

**Condition 1-8: Compliance Demonstration**  
**Effective between the dates of 05/29/2012 and Permit Expiration Date**

**Applicable Federal Requirement: 40CFR 63.463(b)(1)(i), Subpart T**

**Item 1-8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001  
Process: BUC

**Item 1-8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The owner or operator of a Batch Vapor Solvent Cleaning Machine with a Solvent/Air Interface Area of 1.21 Square Meters or less shall comply with the requirements specified in 40CFR 63.463(b)(1)(i).

These sources use compliance option 6 of the possible control options in Table 1.

Freeboard refrigeration device and freeboard ratio of 1.0.

Parameter Monitored: FREEBOARD RATIO

Lower Permit Limit: 1.0 freeboard ratio

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**



**Condition 13: Contaminant List**

**Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable State Requirement:ECL 19-0301**

**Item 13.1:**

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

CAS No: 000075-09-2  
Name: DICHLOROMETHANE

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

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

**Condition 1-9: Unavoidable noncompliance and violations**

**Effective between the dates of 05/29/2012 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 1-9.1:**

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

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

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



action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superseded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

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

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

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

**Condition 15: Emission Unit Definition**  
**Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 15.1(From Mod 1):**

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

Emission Unit: 0-00001

Emission Unit Description:

Emission unit 0-00001 consists of all regulated emission sources in Buildings 1 and 2. Emission sources include spray paint booth, drying ovens, coaters and degreasers.

Building(s): 001  
002

**Item 15.2(From Mod 1):**

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

Emission Unit: 0-00002

Emission Unit Description:

This emission unit consists of spray booths for solvent application in the building 4 Conquest and Atlas Departments.

Building(s): 004

**Item 15.3(From Mod 1):**

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

Emission Unit: 0-00003





requirements;

(ii) changes which do not cause the subject emission unit, emission source, process, or emission point to become subject to any additional regulations or requirements;

(iii) changes that do not seek to establish or modify a federally-enforceable emission cap or limit.

(2) In addition to the record keeping required under (b)(1) above, the permittee must notify the Department in writing at least 30 calendar days in advance of making changes involving:

(i) the installation or relocation of any emission source, process, or emission point within a facility;

(ii) the emission of any air pollutant not previously authorized or emitted in accordance with a permit issued by the Department;

(iii) the installation or alteration of any air cleaning installation, device or control equipment.

(3) The Department may require a permit modification, in order to impose new applicable requirements or special permit conditions if it determines that changes proposed pursuant to notification under (2) above do not meet the criteria under (1) or the change may have a significant air quality impact. In such cases the Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the potential air quality impacts and/or applicable requirements. The Department shall respond to the permittee in writing with such a determination within 15 days of receipt of the 30 day advance notification from the permittee. The Department's determination shall include a listing of information necessary to further review the proposed change.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-10: Visible Emissions Limited**  
**Effective between the dates of 05/29/2012 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 1-10.1:**

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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 18: Compliance Demonstration**  
**Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 212.4 (a)**

**Item 18.1:**

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

Emission Unit: 0-00003

Emission Unit: 0-00004

Emission Unit: 0-00005

**Item 18.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions that violate the requirement specified in Table 2 of this Part for the environmental rating issued by the Commissioner.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 19: Emission Point Definition By Emission Unit**  
**Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 19.1(From Mod 1):**

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

Emission Unit: 0-00001

Emission Point: 00001

Height (ft.): 39

Diameter (in.): 10

NYTMN (km.): 4798.205

NYTME (km.): 609.169

Building: 001

Emission Point: 00002



Height (ft.): 39	Diameter (in.): 6	
NYTMN (km.): 4798.205	NYTME (km.): 609.169	Building: 001
Emission Point: 00003		
Height (ft.): 39	Diameter (in.): 12	
NYTMN (km.): 4798.205	NYTME (km.): 609.169	Building: 001
Emission Point: 00004		
Height (ft.): 39	Diameter (in.): 12	
NYTMN (km.): 4798.205	NYTME (km.): 609.169	Building: 001
Emission Point: 00005		
Height (ft.): 10	Diameter (in.): 16	
NYTMN (km.): 4798.205	NYTME (km.): 609.169	Building: 001
Emission Point: 00006		
Height (ft.): 3	Diameter (in.): 16	
NYTMN (km.): 4798.205	NYTME (km.): 609.169	Building: 001
Emission Point: 00024		
Height (ft.): 40	Diameter (in.): 34	
NYTMN (km.): 4798.226	NYTME (km.): 609.219	Building: 001
Emission Point: 00038		
Height (ft.): 10	Diameter (in.): 6	
NYTMN (km.): 4798.226	NYTME (km.): 609.216	Building: 001
Emission Point: 00048		
Height (ft.): 40	Diameter (in.): 25	
NYTMN (km.): 4798.229	NYTME (km.): 609.214	Building: 001
Emission Point: 00049		
Height (ft.): 11	Diameter (in.): 24	
NYTMN (km.): 4798.226	NYTME (km.): 609.216	Building: 001
Emission Point: 00050		
Height (ft.): 11	Diameter (in.): 6	
NYTMN (km.): 4798.224	NYTME (km.): 609.216	Building: 001
Emission Point: 00052		
Height (ft.): 13	Length (in.): 10	Width (in.): 10
NYTMN (km.): 4798.229	NYTME (km.): 609.214	Building: 001
Emission Point: 00054		
Height (ft.): 34	Length (in.): 14	Width (in.): 19
NYTMN (km.): 4798.221	NYTME (km.): 609.216	Building: 001
Emission Point: 00055		
Height (ft.): 30	Length (in.): 14	Width (in.): 19
NYTMN (km.): 4798.221	NYTME (km.): 609.216	Building: 001
Emission Point: 00056		



Height (ft.): 18	Length (in.): 11	Width (in.): 11
NYTMN (km.): 4798.221	NYTME (km.): 609.216	Building: 001
Emission Point: 00063		
Height (ft.): 29	Diameter (in.): 14	
NYTMN (km.): 4798.226	NYTME (km.): 609.216	Building: 001
Emission Point: 00085		
Height (ft.): 21	Diameter (in.): 10	
NYTMN (km.): 4798.224	NYTME (km.): 609.216	Building: 001
Emission Point: 00089		
Height (ft.): 19	Diameter (in.): 10	
NYTMN (km.): 4798.221	NYTME (km.): 609.214	Building: 001
Emission Point: 10079		
Height (ft.): 32	Diameter (in.): 25	
NYTMN (km.): 4798.218	NYTME (km.): 609.219	Building: 002
Emission Point: 10080		
Height (ft.): 33	Diameter (in.): 23	
NYTMN (km.): 4798.218	NYTME (km.): 609.222	Building: 002
Emission Point: 10081		
Height (ft.): 33	Diameter (in.): 23	
NYTMN (km.): 4798.216	NYTME (km.): 609.219	Building: 002
Emission Point: 10082		
Height (ft.): 30	Diameter (in.): 18	
NYTMN (km.): 4798.218	NYTME (km.): 609.222	Building: 002
Emission Point: 10083		
Height (ft.): 30	Diameter (in.): 12	
NYTMN (km.): 4798.218	NYTME (km.): 609.216	Building: 002
Emission Point: 10084		
Height (ft.): 38	Diameter (in.): 8	
NYTMN (km.): 4798.218	NYTME (km.): 609.216	Building: 002
Emission Point: 10094		
Height (ft.): 30	Diameter (in.): 12	
NYTMN (km.): 4798.232	NYTME (km.): 609.177	Building: 001

**Item 19.2(From Mod 1):**

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

Emission Unit: 0-00002

Emission Point: 00061		
Height (ft.): 19	Diameter (in.): 10	
NYTMN (km.): 4798.226	NYTME (km.): 609.182	Building: 004

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Emission Point: 00062			
Height (ft.): 19	Diameter (in.): 10		
NYTMN (km.): 4798.226	NYTME (km.): 609.179	Building: 004	
Emission Point: 00069			
Height (ft.): 19	Diameter (in.): 10		
NYTMN (km.): 4798.229	NYTME (km.): 609.179	Building: 004	
Emission Point: 00070			
Height (ft.): 19	Diameter (in.): 8		
NYTMN (km.): 4798.226	NYTME (km.): 609.179	Building: 004	
Emission Point: 00071			
Height (ft.): 19	Diameter (in.): 10		
NYTMN (km.): 4798.226	NYTME (km.): 609.174	Building: 004	
Emission Point: 00072			
Height (ft.): 19	Diameter (in.): 10		
NYTMN (km.): 4798.232	NYTME (km.): 609.185	Building: 004	
Emission Point: 00073			
Height (ft.): 19	Diameter (in.): 10		
NYTMN (km.): 4798.226	NYTME (km.): 609.182	Building: 004	
Emission Point: 00080			
Height (ft.): 19	Diameter (in.): 10		
NYTMN (km.): 4798.229	NYTME (km.): 609.179	Building: 004	
Emission Point: 00081			
Height (ft.): 19	Diameter (in.): 10		
NYTMN (km.): 4798.229	NYTME (km.): 609.179	Building: 004	
Emission Point: 00082			
Height (ft.): 19	Diameter (in.): 8		
NYTMN (km.): 4798.229	NYTME (km.): 609.179	Building: 004	
Emission Point: 00103			
Height (ft.): 19	Diameter (in.): 10		
NYTMN (km.): 4798.232	NYTME (km.): 609.185	Building: 004	
Emission Point: 00107			
Height (ft.): 19	Diameter (in.): 10		
NYTMN (km.): 4798.232	NYTME (km.): 609.179	Building: 004	
Emission Point: 00108			
Height (ft.): 24	Diameter (in.): 10		
NYTMN (km.): 4798.234	NYTME (km.): 609.179	Building: 004	
Emission Point: 10042			
Height (ft.): 22	Diameter (in.): 10		
NYTMN (km.): 4798.232	NYTME (km.): 609.182	Building: 004	



Emission Point: 10090  
Height (ft.): 22 Diameter (in.): 12  
NYTMN (km.): 4798.232 NYTME (km.): 609.182 Building: 004

**Item 19.3(From Mod 1):**

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

Emission Unit: 0-00003

Emission Point: 00058  
Height (ft.): 19 Diameter (in.): 13  
NYTMN (km.): 4798.232 NYTME (km.): 609.145 Building: 003

**Item 19.4(From Mod 1):**

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

Emission Unit: 0-00004

Emission Point: 00007  
Height (ft.): 14 Length (in.): 12 Width (in.): 12  
NYTMN (km.): 4798.205 NYTME (km.): 609.169 Building: 005

Emission Point: 10096  
Height (ft.): 31 Diameter (in.): 18  
NYTMN (km.): 4798.195 NYTME (km.): 609.142 Building: 005

**Item 19.5(From Mod 1):**

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

Emission Unit: 0-00005

Emission Point: 10066  
Height (ft.): 16 Diameter (in.): 12  
NYTMN (km.): 4798.195 NYTME (km.): 609.193 Building: 006

**Condition 20: Process Definition By Emission Unit  
Effective between the dates of 04/18/2007 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 20.1(From Mod 1):**

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

Emission Unit: 0-00001  
Process: BHC  
Process Description: This is the BH dip coating line in building 1.

Emission Source/Control: BHCOT - Process

Emission Source/Control: BU101 - Process

**Item 20.2(From Mod 1):**

**New York State Department of Environmental Conservation**

Permit ID: 5-5234-00007/00087

Facility DEC ID: 5523400007



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

Emission Unit: 0-00001

Process: BUC

Process Description:

This process consists of the Branson Ultrasonic Cleaners using methylene chloride as degreasing agent.

Emission Source/Control: BU101 - Process

Emission Source/Control: DEGR1 - Process

**Item 20.3(From Mod 1):**

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

Emission Unit: 0-00001

Process: BUS

Process Description:

This process is the exhaust from 6 spray booths, two pot cleaning tanks, three finish spray booths and one vent for a chemical dispensing area. All emission sources are vented through one emission point. The 6 spray booths and 2 finish spray booths are equipped with expanded paper arrestor pads to capture paint emissions prior to exhausting into the atmosphere.

Emission Source/Control: OFB-1 - Process

Emission Source/Control: OFB-2 - Process

Emission Source/Control: FIN01 - Process

Emission Source/Control: HOOD1 - Process

Emission Source/Control: POT-1 - Process

Emission Source/Control: SPB-1 - Process

Emission Source/Control: SPB-2 - Process

Emission Source/Control: SPB-3 - Process

Emission Source/Control: SPB-4 - Process

Emission Source/Control: SPB-5 - Process

Emission Source/Control: SPB-6 - Process

**Item 20.4(From Mod 1):**

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

Emission Unit: 0-00001

New York State Department of Environmental Conservation

Permit ID: 5-5234-00007/00087

Facility DEC ID: 5523400007



Process: GB1

Process Description:

Twelve Glebar machines which are used for surface grinding stainless steel wire located in building 1

Emission Source/Control: GB101 - Process

**Item 20.5(From Mod 1):**

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

Emission Unit: 0-00001

Process: HDR

Process Description: The process consists of the hydrophillic dip rig.

Emission Source/Control: HYDRO - Process

**Item 20.6(From Mod 1):**

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

Emission Unit: 0-00001

Process: IMP

Process Description:

Six ovens are used to cure woven catheter bodies with an impregnation solvent/resin.

Emission Source/Control: OVE02 - Process

Emission Source/Control: OVE04 - Process

Emission Source/Control: OVE05 - Process

Emission Source/Control: OVE06 - Process

Emission Source/Control: OVE44 - Process

Emission Source/Control: OVE53 - Process

**Item 20.7(From Mod 1):**

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

Emission Unit: 0-00001

Process: INF

Process Description:

An infrared curing oven is used to dry the Teflon coating on catheters. The unit is vented through a single stack.

Emission Source/Control: OVEN7 - Process

**Item 20.8(From Mod 1):**

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

Emission Unit: 0-00001



Process: LUT

Process Description:

The process consists of five Lutonix coating system process lines which are used to create catheters with a methanol based medicinal coating. Also included

Emission Source/Control: LUT01 - Process

Emission Source/Control: LUT02 - Process

Emission Source/Control: LUT03 - Process

Emission Source/Control: LUT04 - Process

Emission Source/Control: LUT05 - Process

Emission Source/Control: LUT06 - Process

**Item 20.9(From Mod 1):**

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

Emission Unit: 0-00001

Process: MAP

Process Description:

Applying an isopropanol based solution via enclosed automated Harland Spray Booth as a source. This process utilizes fan # 029.

Emission Source/Control: HCS01 - Process

**Item 20.10(From Mod 1):**

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

Emission Unit: 0-00001

Process: MIX

Process Description:

This process consists of a dust collector equipped with a bag filter, located in the rack department of building 1. The dust is collected from the tin powder in the mix area.

Emission Source/Control: DUST1 - Process

**Item 20.11(From Mod 1):**

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

Emission Unit: 0-00001

Process: NAV

Process Description:

The process consists of winding wire, heat treating wire, application of urethane coating, and various benchtop assembly operations such as cut to length, hand

**New York State Department of Environmental Conservation**

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Facility DEC ID: 5523400007



solvent cleaning, bonding and silicone coating. The urethane coating operation uses a pressurized die to apply the viscous coating to the wire substrate in a humidity controlled environment. Exhaust is vented through 3 stacks using fans # 79, 80 and 81.

Emission Source/Control: NAVEX - Process

Emission Source/Control: UC-CP - Process

Emission Source/Control: UC-FH - Process

**Item 20.12(From Mod 1):**

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

Emission Unit: 0-00001

Process: NIT

Process Description:

Nitinol wire is cut to length, welded and crimped, then wound on a fixture. The product is then annealed in the sodium nitrate salt bath in the furnace at 896 degrees F. It is then cleaned using isopropyl alcohol and inspected. Some product is coated using urethane resin with tetrahydrofuran in the Navarre room.

Emission Source/Control: OV162 - Process

Emission Source/Control: SLTBH - Process

**Item 20.13(From Mod 1):**

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

Emission Unit: 0-00001

Process: PRI

Process Description:

This process consists of drying ovens used for curing coatings on catheters following spraying at the booths, ventilation of the drying booths, ovens used for drying inks on the catheters and exhaust trunks for the print area.

Emission Source/Control: CO-OV - Process

Emission Source/Control: DRY-1 - Process

Emission Source/Control: DRYOV - Process

Emission Source/Control: EXHAT - Process

Emission Source/Control: INKOV - Process

**Item 20.14(From Mod 1):**



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

Emission Unit: 0-00001  
Process: TEF  
Process Description:  
An electronic spray booth is used to spray Teflon coating onto catheters. The unit is vented through a single stack.

Emission Source/Control: PRECP - Process

**Item 20.15(From Mod 1):**

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

Emission Unit: 0-00002  
Process: CON  
Process Description:  
This process consists of the spray booths for solvent application in the Building 4 Conquest and Atlas departments. The Atlas sources are vented through 2 stacks using fans #45, 90, 103, 107, and 108. The Conquest sources are thirteen small booths which utilize fans #42, 43 and 44.

Emission Source/Control: ATL01 - Process

Emission Source/Control: ATL02 - Process

Emission Source/Control: CON01 - Process

Emission Source/Control: CON02 - Process

Emission Source/Control: CON03 - Process

Emission Source/Control: SPB-8 - Process

Emission Source/Control: SPB-9 - Process

**Item 20.16(From Mod 1):**

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

Emission Unit: 0-00003  
Process: LAT  
Process Description:  
This process contains a vented hood used for mixing latex. Alcohol and ammonia are the only volatile constituents of the latex mix.

Emission Source/Control: HOOD2 - Process

**Item 20.17(From Mod 1):**

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

New York State Department of Environmental Conservation

Permit ID: 5-5234-00007/00087

Facility DEC ID: 5523400007



Emission Unit: 0-00004

Process: GB2

Process Description:

Four Glebar machines are used for surface grinding stainless steel wire located in building 5.

Emission Source/Control: GB201 - Process

Emission Source/Control: GB202 - Process

Emission Source/Control: GB203 - Process

Emission Source/Control: GB204 - Process

**Item 20.18(From Mod 1):**

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

Emission Unit: 0-00004

Process: POR

Process Description:

This process consists of metal finishing in building 5. It includes exhaust from an acid passivation unit which vents through a single stack using fan #96.

Emission Source/Control: FH041 - Process

Emission Source/Control: PVB01 - Process

**Item 20.19(From Mod 1):**

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

Emission Unit: 0-00005

Process: RED

Process Description:

This process consists of soaking catheters in pentane. The catheters are then placed in a down draft vent to remove any vapors.

Emission Source/Control: EXHT2 - Process

