



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 5-5332-00025/00020
Effective Date:

Expiration Date:

Permit Issued To: MANCHESTER WOOD INC
PO BOX 1087
MANCHESTER, VT 05254

Contact: EDWARD ERIKSEN
PO BOX 180 NORTH ST
GRANVILLE, NY 12832
(518) 642-9518

Facility: MANCHESTER WOOD INC
NORTH ST
GRANVILLE, NY 12832

Description:

The facility is a wood furniture manufacturer. Raw lumber of random length and width is processed by cutting, ripping, machining, drilling, sanding and assembling. The furniture is then finished in one of two coating lines and packaged for sale.

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 PO BOX 220
WARRENSBURG, NY 12885-0220

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

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



DEC GENERAL CONDITIONS

****** General Provisions ******

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: 6NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:



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

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 4.1:

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

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

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

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

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 5 Sub-office
Division of Environmental Permits
232 Golf Course Road, PO Box 220
Warrensburg, NY 12885-0220
(518) 623-1281



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: MANCHESTER WOOD INC
PO BOX 1087
MANCHESTER, VT 05254

Facility: MANCHESTER WOOD INC
NORTH ST
GRANVILLE, NY 12832

Authorized Activity By Standard Industrial Classification Code:
2511 - WOOD HOUSEHOLD FURNITURE

Permit Effective Date:

Permit Expiration Date:



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

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

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
 - 8 6NYCRR 201-6.5(a)(7): Fees
 - 15 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
 - 16 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
 - 17 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
 - 18 6NYCRR 201-6.5(e): Compliance Certification
 - 19 6NYCRR 202-2.1: Compliance Certification
 - 20 6NYCRR 202-2.5: Recordkeeping requirements
 - 14 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
 - 2 6NYCRR 200.7: Maintenance of Equipment
 - 3 6NYCRR 201-1.7: Recycling and Salvage
 - 4 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
 - 5 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
 - 6 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
 - 7 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
 - 9 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
 - 10 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
 - 11 6NYCRR 201-6.5(f)(6): Off Permit Changes
 - 12 6NYCRR 202-1.1: Required Emissions Tests
 - 13 6NYCRR 211.3: Visible Emissions Limited
 - 21 40CFR 68: Accidental release provisions.
 - 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
 - 23 6NYCRR 201-6: Emission Unit Definition
 - 24 40CFR 63.803, Subpart JJ: Subpart JJ: Work Practice Implementation Plan-(this condition includes all elements of the plan)
 - 25 40CFR 63.805, Subpart JJ: Performance test methods - coating content
- #### Emission Unit Level
- 26 6NYCRR 201-6: Emission Point Definition By Emission Unit
 - 27 6NYCRR 201-6: Process Definition By Emission Unit

EU=U-00001

- 28 6NYCRR 228.4: Compliance Certification
- 29 6NYCRR 228.5(a): Compliance Certification
- 30 6NYCRR 228.8: Compliance Certification



- 31 6NYCRR 228.8: Compliance Certification
- 32 6NYCRR 228.8: Compliance Certification
- 33 6NYCRR 228.8: Compliance Certification
- 34 6NYCRR 228.8: Compliance Certification
- 35 6NYCRR 228.8: Compliance Certification
- 36 6NYCRR 228.9: Product regulated
- 37 6NYCRR 228.10: Compliance Certification
- 38 40CFR 63.804(a)(1), Subpart JJ: Compliance Certification
- 39 40CFR 63.804(g)(1), Subpart JJ: Compliance Certification
- 40 40CFR 63.804(g)(5), Subpart JJ: Compliance Certification
- 41 40CFR 63.804(g)(8), Subpart JJ: Compliance Certification
- 42 40CFR 63.806(e), Subpart JJ: Compliance Certification

EU=U-00001,Proc=101

- 43 40CFR 63.802, Subpart JJ: Compliance Certification

EU=U-00001,EP=00010

- 44 6NYCRR 227-1.2(a)(4): Compliance Certification
- 45 6NYCRR 227-1.3(a): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 46 ECL 19-0301: Contaminant List
- 47 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 48 6NYCRR 211.2: Air pollution prohibited



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: Emergency Defense - 6NYCRR Part 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 B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 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 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



- Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(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 D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(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 E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(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 F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(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 H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(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 J: Permit Shield - 6 NYCRR Part 201-6.5(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 K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the



effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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

Item 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.

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

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

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

Applicable Federal Requirement:6NYCRR 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 8: Fees
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-6.5(a)(7)

Item 8.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

**Condition 15: Recordkeeping and reporting of compliance monitoring
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-6.5(c)

Item 15.1:

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 201-6.3 of this Part 201.

Condition 16: Monitoring, Related Recordkeeping, and Reporting Requirements.
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 16.1:

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

Condition 17: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 17.1:

The Compliance Certification activity will be performed for the Facility.

Item 17.2:

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 201-6.3(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 shall be submitted to the Administrator (or his or her representative) as well as two copies 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). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 18: Compliance Certification
Effective for entire length of Permit



Applicable Federal Requirement:6NYCRR 201-6.5(e)

Item 18.1:

The Compliance Certification activity will be performed for the Facility.

Item 18.2:

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 compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies 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



Applicable Federal Requirement:6NYCRR 202-2.5

Item 20.1:

(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 14: Open Fires Prohibited at Industrial and Commercial Sites
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 215

Item 14.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**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 2: Maintenance of Equipment
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 200.7

Item 2.1:

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 3: Recycling and Salvage
Effective for entire length of Permit**



Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 201-6.5(f)(6)

Item 11.1:

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 201-6.6 shall not apply to any change made pursuant to this paragraph.

**Condition 12: Required Emissions Tests
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 202-1.1

Item 12.1:

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. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

**Condition 13: Visible Emissions Limited
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 211.3

Item 13.1:

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



Applicable Federal Requirement:40CFR 68

Item 21.1:

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 22: Recycling and Emissions Reduction
 Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 82, Subpart F

Item 22.1:

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 23: Emission Unit Definition
 Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-6

Item 23.1:

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

Emission Unit: U-00001

Emission Unit Description:

THIS FACILITY TAKES RAW LUMBER AND
PROCESSES IT BY CUTTING, MACHINING,
DRILLING, SANDING, ASSEMBLING, AND



FINISHING FURNITURE AND ACCESSORIES.

Building(s): MI

**Condition 24: Subpart JJ: Work Practice Implementation Plan-(this condition includes all elements of the plan)
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.803, Subpart JJ

Item 24.1:

Work Practice Implementation Plan

Each owner or operator of a facility subject to 40CFR63 Subpart JJ must prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation. The plan must include the following elements:

1. Operator training Course. All new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of Subpart JJ must be trained. For existing personnel, the training must take place within six months of the compliance date. New personnel hired after the compliance date must be trained upon hiring. A refresher course is required yearly. Records of the training, including a list of attendees and the lesson plans, are to be kept on site. The training must include appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes.

2. Inspection and maintenance plan. A written leak inspection and maintenance plan must be prepared. The plan must include:

1. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents.
2. An inspection schedule.
3. Methods for documenting the date and results of each inspection and any repairs made.
4. The timeframe between identifying the leak and making the repair.

3. Cleaning and washoff solvent accounting system. An organic solvent accounting form must be developed to record:

1. The quantity and type of organic solvent used each month for washoff and cleaning.
2. The number of pieces washed off, and the reason for the washoff.
3. The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

4. Chemical composition of cleaning and washoff solvents. Cleaning and washoff solvents containing any of the pollutants listed in Table 4 of Subpart JJ, in concentrations subject to MSDS reporting, may not be used.



5. Spray booth cleaning. Compounds containing more than 8.0 percent (by weight) of VOC are not to be used for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the booth is being refurbished, that is the spray booth coating is being replaced, no more than 1.0 gallon of organic solvent per booth may be used to prepare the booth prior to applying the booth coating.

6. Storage requirements. Normally closed containers are to be used for storing finishing, gluing, cleaning and washoff materials.

7. Application equipment requirements. Conventional air spray guns are not to be used to apply finishing materials except under the special circumstances outlined in 40CFR63.803(h)

8. Line cleaning. All organic solvent used for line cleaning shall be pumped or drained into a normally closed container.

9. Gun cleaning. All organic solvent used to clean spray guns shall be collected into a normally closed container.

10. Washoff operations. Emissions from washoff operations shall be controlled by:

1. Using normally closed tanks for washoff
2. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

11. Formulation assessment plan for finishing operations. This plan must:

1. Identify VHAP from Table 5 of Subpart JJ that are being used in finishing operations at the facility.
2. Establish a baseline level of usage for each identified VHAP. This shall be the highest annual usage from 1994, 1995, or 1996 for each VHAP.
3. Track the annual usage of each identified VHAP present in amounts subject to MSDS reporting by the facility.
4. If, after November 1998, the annual usage of any identified VHAP exceeds the baseline level, the owner must notify the Division of Air Resources.

**Condition 25: Performance test methods - coating content
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.805, Subpart JJ

Item 25.1:

The EPA Method 311 of appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the cure (for example, all VOC and HAP present in the coating is



solvent), then batch formulation information shall be accepted.

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

**Condition 26: Emission Point Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-6

Item 26.1:

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

Emission Unit: U-00001

Emission Point: 00003

Height (ft.): 45 Diameter (in.): 34
NYTMN (km.): 4808.758 NYTME (km.): 640.009 Building: MI

Emission Point: 00004

Height (ft.): 45 Diameter (in.): 34
NYTMN (km.): 4808.751 NYTME (km.): 640.014 Building: MI

Emission Point: 00005

Height (ft.): 45 Diameter (in.): 34
NYTMN (km.): 4808.742 NYTME (km.): 640.019 Building: MI

Emission Point: 00006

Height (ft.): 45 Diameter (in.): 34
NYTMN (km.): 4808.737 NYTME (km.): 640.022 Building: MI

Emission Point: 00007

Height (ft.): 45 Diameter (in.): 34
NYTMN (km.): 4808.726 NYTME (km.): 639.947 Building: MI

Emission Point: 00008

Height (ft.): 45 Diameter (in.): 34
NYTMN (km.): 4808.733 NYTME (km.): 639.952 Building: MI

Emission Point: 00009

Height (ft.): 45 Diameter (in.): 10
NYTMN (km.): 4808.738 NYTME (km.): 639.959 Building: MI

Emission Point: 00010

Height (ft.): 30 Diameter (in.): 12
NYTMN (km.): 4808.735 NYTME (km.): 639.967 Building: MI

**Condition 27: Process Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 201-6

Item 27.1:



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

Emission Unit: U-00001

Process: 101

Source Classification Code: 3-07-020-99

Process Description:

Assemble furniture and accessories by gluing together component parts using compliant adhesives.

Emission Source/Control: 00001 - Process

Item 27.2:

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

Emission Unit: U-00001

Process: 102

Source Classification Code: 4-02-999-95

Process Description:

There are two overhead conveyerized finishing systems that use compliant coatings. The wood furniture pieces go through a staining, sealing and topcoat process. The main system consists of 3 spray booths and 1 drying oven. The second system consists of 3 spray booths.

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: 00008 - Process

Emission Source/Control: 00009 - Process

Item 27.3:

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

Emission Unit: U-00001

Process: 103

Source Classification Code: 1-05-002-09

Process Description:

During the winter months when the temperature drops below freezing, scrap wood that is kiln dried is hand fired in G & S Mill hot air furnace to heat outside air and blow the warmer air into building to make up for exhausted air from process 102. This is an air make-up unit used only during production hours and approximately three months per year.

Emission Source/Control: 10010 - Combustion

Design Capacity: 1.3 million Btu per hour



Condition 28: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.4

Item 28.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

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 to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any emission source subject to 6NYCRR Part 228.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

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: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 29: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.5(a)

Item 29.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied



coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the Department and, upon request, these records must be submitted to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 30: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.8

Item 30.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

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

Item 30.2:

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 wood clear topcoat coating lines is 5.6

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING LINES

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 5.6 pounds per gallon

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 31: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.8

Item 31.1:

The Compliance Certification activity will be performed for:



Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 33: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.8

Item 33.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 33.2:

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 semitransparent stain wood coating lines is 6.8

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING LINES

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 6.8 pounds per gallon

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED PER OCCURRENCE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 34: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.8

Item 34.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001



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 wood wash coat coating lines is 6.1

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING LINES

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 6.1 pounds per gallon

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 35: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:6NYCRR 228.8

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

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

Item 35.2:

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 opaque wood stain coating lines is 4.7

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING LINES

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 4.7 pounds per gallon

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL



CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 36: Product regulated
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.9

Item 36.1:

This Condition applies to Emission Unit: U-00001

Item 36.2:

The "Process" and "Description of Products" columns in tables 1 and 2 of sections 228.7 and 228.8 of 6 NYCRR Part 228 may not contain all possible products in each coating line category. For any "Process" and "Description of Products" not specifically listed, the department will determine, based on inspections or the process, emission source, and product to be coated, the maximum permitted pounds of VOC per gallon, minus water and excluded VOC, of coating at application.

Condition 37: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 228.10

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work areas associated with a coating line, the owner or operator of a facility subject to Part 228 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 unless production, sampling, maintenance or inspection procedures require operational access.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 38: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.804(a)(1), Subpart JJ

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Calculate the average VHAP content for all finishing materials used at the facility and maintain a value of no greater than 1.0 lb. vhap per pound solids, using the equation in 40CFR63.804(a)(1).

Monitoring Frequency: MONTHLY

Averaging Method: 30-DAY AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 39: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.804(g)(1), Subpart JJ

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: ONY100-00-0 HAP

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



The owner or operator of an affected source that complies by maintaining a monthly average of less than 1.0 lb vhap per pound solids in its finishing materials shall demonstrate continuous compliance by submitting the results of the averaging calculation for each month within the semiannual period and submitting a compliance certification with the semiannual report required by 40CFR63.807(c).

The certification shall state that the value of (E), as calculated by equation 1, is no greater than 1.0 for any month.

The compliance certification shall be signed by a responsible official of the company that owns the affected source.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

Applicable Federal Requirement:40CFR 63.804(g)(5), Subpart JJ

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source that is complying with 40CFR63 Subpart JJ by using compliant contact and/or foam adhesives shall submit a compliance certification with the semiannual report required by 40CFR63.807(c).

The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day that noncompliant contact and/or foam adhesives were used. Each day that a noncompliant contact or foam adhesive is used is a single violation of 40CFR63 Subpart JJ.

The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 41: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.804(g)(8), Subpart JJ

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source that is subject to the work practice standards in 40CFR63.803 shall submit a compliance certification with the semiannual report required by 40CFR63.807(c).

The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day that the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions the plan, each failure to implement an obligation under the plan during any particular day is a violation.

The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 42: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.806(e), Subpart JJ

Item 42.1:

The Compliance Certification activity will be performed for:



Emission Unit: U-00001

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owner/operator subject to the work practice standards in 40CFR63.803 shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of the plan, including, but not limited to:

- 1) Records demonstrating that the operator training program required by 63.803(b) is in place;
- 2) Records associated with the cleaning solvent accounting system required by 63.803(d);
- 3) Records associated with the limitation on use of conventional air spray guns showing total finishing materials applied with conventional air spray guns for each semi-annual period as required by 63.803(h)(5);
- 4) Records associated with the formulation assessment plan required by 63.803(l)

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

Applicable Federal Requirement:40CFR 63.802, Subpart JJ

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

Process: 101

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The VHAP content of all contact adhesives used in products that are not subject to upholstered seating flammability requirements shall not exceed 1.0 kg VHAP/kg solids, as applied (1.0 lb VHAP/lb solids, as applied). This limit does not apply to aerosol adhesives or contact adhesives that are applied to nonporous substrates.



Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: ADHESIVE
Parameter Monitored: VOLATILE HAZARDOUS AIR POLLUTANT - PART 63, SUBPART JJ
Upper Permit Limit: 1.0 pounds of volatile hazardous air pollutant per pounds of solids
Reference Test Method: EPA Method 311
Monitoring Frequency: SINGLE OCCURRENCE
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 44: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 227-1.2(a)(4)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00010

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

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The particulate emission rate limit is 0.60 pounds per million Btu. Emission testing will be required at the discretion of the permitting authority.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.60 pounds per million Btus

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: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 45: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6NYCRR 227-1.3(a)

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00010



Item 45.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall operate the installation in such a way to emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test Method 9 in Appendix A of 40 CFR 60.

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 (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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: 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 46: Contaminant List
Effective for entire length of Permit**

Applicable State Requirement:ECL 19-0301

Item 46.1:

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

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

CAS No: 0NY100-00-0



Name: HAP

CAS No: 0NY998-00-0

Name: VOC

**Condition 47: Unavoidable noncompliance and violations
Effective for entire length of Permit**

Applicable State Requirement:6NYCRR 201-1.4

Item 47.1:

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 superceded 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 48: Air pollution prohibited
Effective for entire length of Permit

Applicable State Requirement:6NYCRR 211.2

Item 48.1:

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.

