



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-2126-00091/00001
Mod 0 Effective Date: 05/22/2002 Expiration Date: No expiration date.
Mod 1 Effective Date: 05/01/2009 Expiration Date: No expiration date.

Permit Issued To: F E HALE MFG CO
PO BOX 186
FRANKFORT, NY 13340

Contact: JON G BENSON
F E HALE MANUFACTURING
PO BOX 186
FRANKFORT, NY 13340
(315) 894-5490

Facility: F E HALE MANUFACTURE COMPANY
120 BENSON PL|NORTH FRANKFORT INDUSTRIAL PARK
FRANKFORT, NY 13340

Contact: JON G BENSON
F E HALE MANUFACTURING
PO BOX 186
FRANKFORT, NY 13340
(315) 894-5490

Description:
This modification has been executed to improve and update the applicability of the permit to the actual conditions at the facility. All reporting has been changed to "Annual-calendar". A requirement to repeat, on a five year frequency) stack testing of the boiler (EU 00001) has been removed. The usage of "grouping" throughout the permit has made the permit more concise. Various description fields have been re-written. Permitting for a solvent degreaser have been removed.



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: PATRICK M CLEAREY
 NYSDEC - REG 6
 207 GENESEE ST
 UTICA, NY 13501

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 and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal -REGION 6 SUBOFFICE
- Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA



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 1-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3:

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



submitted prior to actual transfer of ownership.

Condition 3: Applications for Permit Renewals and Modifications

Applicable State Requirement: 6NYCRR 621.13

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 1-2: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6NYCRR 621.13

Item 1-2.1:

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 4: Permit Modifications, Suspensions and Revocations by the Department

Applicable State Requirement: 6NYCRR 621.14

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;



- 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 Applications for Permit Modification or Renewal -REGION 6
SUBOFFICE**

Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 6 Sub-office
Division of Environmental Permits
State Office Building, 207 Genesee Street
Utica, NY 13501-2885
(315) 793-2555

**Condition 1-3: Submission of application for permit modification or
renewal-REGION 6**

SUBOFFICE - UTICA

Applicable State Requirement: 6NYCRR 621.6(a)

Item 1-3.1:

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

NYSDEC Regional Permit Administrator
Region 6 Sub-office
Division of Environmental Permits
State Office Building, 207 Genesee Street
Utica, NY 13501-2885
(315) 793-2555



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: F E HALE MFG CO
PO BOX 186
FRANKFORT, NY 13340

Facility: F E HALE MANUFACTURE COMPANY
120 BENSON PL|NORTH FRANKFORT INDUSTRIAL PARK
FRANKFORT, NY 13340

Authorized Activity By Standard Industrial Classification Code:
2521 - WOOD OFFICE FURNITURE

Mod 0 Permit Effective Date: 05/22/2002
date.

Permit Expiration Date: No expiration
date.

Mod 1 Permit Effective Date: 05/01/2009
date.

Permit Expiration Date: No 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
Applications for Permit Renewals and Modifications
Permit modifications, suspensions or revocations by the Department
Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 6 SUBOFFICE
Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 201-3.1(a): Exempt and Trivial Activities Applicability
- 2 6NYCRR 201-3.2(b): Exempt Activities - Maintenance of Control Equipment
- 1-1 6NYCRR 201-7.2: Facility Permissible Emissions
- *1-2 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-3 6NYCRR 201-7.2: Capping Monitoring Condition
- *1-4 6NYCRR 201-7.2: Capping Monitoring Condition
- 8 6NYCRR 202-1.2: Notification
- 9 6NYCRR 202-1.3(a): Acceptable procedures
- 10 6NYCRR 202-1.4: Separate emission test by the commissioner
- 11 6NYCRR 202-1.5: Prohibitions
- 1-5 6NYCRR 212.4(c): Compliance Demonstration
- 1-6 6NYCRR 212.6(a): Compliance Demonstration
- 15 6NYCRR 227-1.1: No hand firing of Bituminous coal
- 1-7 6NYCRR 227-1.3(a): Compliance Demonstration
- 16 6NYCRR 227-1.7(b): Emissions data requirements.
- 1-8 6NYCRR 228.1(a): Permit Requirements
- 1-9 6NYCRR 228.1(e)(13): Compliance Demonstration
- 1-10 6NYCRR 228.2(b)(35): Compliance Demonstration
- 1-11 6NYCRR 228.4: Compliance Demonstration
- 1-12 6NYCRR 228.5(h): Compliance Demonstration
- 1-13 6NYCRR 228.6(a): Prohibition of Sale

Emission Unit Level

- 1-14 6NYCRR 201-7.2: Emission Unit Permissible Emissions

EU=0-00001

- 1-15 6NYCRR 227-1.2(a)(4): Compliance Demonstration
- 36 6NYCRR 227-1.6(c): Corrective Action
- 37 6NYCRR 227-1.6(d): Corrective Action
- 38 6NYCRR 227-1.7(a): Fuel sampling.

EU=0-00001,EP=0000A



1-16 6NYCRR 227-1.2(a)(4): Compliance Demonstration

EU=0-00003

1-17 6NYCRR 212.4(c): Compliance Demonstration

1-18 6NYCRR 228.1(d): Will remain subject to Part 228.

1-19 6NYCRR 228.5(a): Compliance Demonstration

1-20 6NYCRR 228.5(d): Department access to obtain samples.

1-21 6NYCRR 228.6(b): Compliance Demonstration

1-22 6NYCRR 228.10: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

55 ECL 19-0301: Contaminant List

56 6NYCRR 201-1.4: Unavoidable noncompliance and violations

57 6NYCRR 201-5: Emission Unit Definition

58 6NYCRR 211.2: Air pollution prohibited

59 6NYCRR 211.2: Compliance Demonstration

Emission Unit Level

61 6NYCRR 201-5: Emission Point Definition By Emission Unit

62 6NYCRR 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 - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 201-1.2

If an existing emission source was subject to the permitting requirements of 6NYCRR 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 - 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 F: Recycling and Salvage - 6NYCRR Part 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 - 6NYCRR Part 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 Part 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 Part 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 Part 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 6NYCRR Part 202-1.

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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.

Item L: Open Fires - 6 NYCRR Part 215

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

Item M: 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 N: 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: Exempt and Trivial Activities Applicability
Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-3.1(a)

Item 1.1:

If the facility owner and/or operator performs any of the exempt and trivial activities listed in 6 NYCRR Part 201-3.2(c) or 201-3.3(c), such activities are exempt from the permitting provisions of 6 NYCRR Part 201-5, but not from other Parts of 6 NYCRR Chapter III, or from applicable permitting requirements of local air pollution control agencies.

Condition 2: Exempt Activities - Maintenance of Control Equipment
Effective between the dates of 05/22/2002 and Permit Expiration Date

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

Item 2.1:

Owner of any emission source or unit that is listed as eligible to be exempt in 6 NYCRR Part 201-3.2(c), on the basis of the use of appropriate emission control device shall operate and maintain such device in a manner consistent with good engineering practices.

Condition 1-1: Facility Permissible Emissions
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 1-1.1:

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:

per year	CAS No: 000067-56-1 (From Mod 1)	PTE: 19,000 pounds
	Name: METHYL ALCOHOL	
per year	CAS No: 000098-82-8 (From Mod 1)	PTE: 19,000 pounds
	Name: BENZENE, (1-METHYLETHYL)	
per year	CAS No: 000100-41-4 (From Mod 1)	PTE: 19,000 pounds
	Name: ETHYLBENZENE	
per year	CAS No: 000108-88-3 (From Mod 1)	PTE: 19,000 pounds
	Name: TOLUENE	



per year	CAS No: 000110-54-3	(From Mod 1)	PTE: 19,000	pounds
	Name: HEXANE			
per year	CAS No: 000111-90-0	(From Mod 1)	PTE: 19,000	pounds
	Name: ETHANOL, 2- (2-ETHOXYETHOXY)			
per year	CAS No: 001330-20-7	(From Mod 1)	PTE: 19,000	pounds
	Name: XYLENE, M, O & P MIXT.			
per year	CAS No: 0NY100-00-0	(From Mod 1)	PTE: 47,500	pounds
	Name: HAP			
per year	CAS No: 0NY998-00-0	(From Mod 1)	PTE: 95,000	pounds
	Name: VOC			

Condition 1-2: Capping Monitoring Condition
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 1-2.1:

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

6NYCRR 201-6.1(a)
40CFR 63-JJ

Item 1-2.2:

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

Item 1-2.3:

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

Item 1-2.4:

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



Item 1-2.5:

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

Item 1-2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000067-56-1	METHYL ALCOHOL
CAS No: 000098-82-8	BENZENE, (1-METHYLETHYL)
CAS No: 000100-41-4	ETHYLBENZENE
CAS No: 000110-54-3	HEXANE
CAS No: 000111-90-0	ETHANOL, 2- (2-ETHOXYETHOXY)
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 000108-88-3	TOLUENE

Item 1-2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility owner shall ensure that emissions of any speciated HAP, including those from permitted, exempt and trivial sources, remain less than 19,000 pounds during any consecutive 365 day period.

Facility owner must maintain records that verify the facility's monthly HAP emissions. Emissions shall be based upon 100% loss of HAP content of each HAP-containing material based on actual material usages. These records must be maintained at the facility for a period of five years.

Reports will be submitted annually, in a format acceptable to the Commissioner's representative, which document that the facility's speciated HAP emissions during any consecutive 365 day period were less than 19,000 pounds. The report must also include all emission factors and other data used in calculating the monthly HAP emission. If the facilities' aggregated HAP emissions are less than 19,000 pounds, then facility may simply state that they are in compliance with each of the 19,000 lb speciated HAP caps. If the facilities' aggregated HAP emissions are greater than 19,000 pounds, then facility shall quantify, in pounds, the emission of each speciated HAP that is referenced in this condition.

Any noncompliance with the speciated HAP emission limit in this condition must be reported by sending a copy of such record to the NYSDEC Region 6 within 30 days of the



occurrence.

Parameter Monitored: HAP
Upper Permit Limit: 19,000 pounds per year
Reference Test Method: EPA Reference Method 18
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 1/30/2010.
Subsequent reports are due every 12 calendar month(s).

Condition 1-3: Capping Monitoring Condition
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 1-3.1:

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

6NYCRR 201-6.1(a)
6NYCRR 212.10(a)(2)
6NYCRR 228.1(b)(5)
6NYCRR 231-2.2(a)
40CFR 52-A.21(i)(1)
40CFR 63-JJ

Item 1-3.2:

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

Item 1-3.3:

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

Item 1-3.4:

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

Item 1-3.5:

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



Item 1-3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility owner shall ensure that emissions of Volatile Organic Compounds (VOC), including those from permitted, exempt, and trivial sources, remain less than 95,000 pounds during any consecutive 365 day period.

Facility owner must maintain records that verify the facility's monthly VOC emissions. These records must be maintained at the facility for a period of five years.

Reports will be submitted annually, in a format acceptable to the commissioner's representative, which document that the facility's VOC emissions during any consecutive 365 day period were less than 95,000 pounds. The annual monitoring report must include information that documents the VOC emissions from each emission source at the facility, including exempt and trivial activities. The report must also include all emission factors and other data used in calculating the monthly VOC emissions.

Any noncompliance with the VOC emission limit in this condition must be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: VOC

Upper Permit Limit: 95,000 pounds per year

Reference Test Method: EPA Reference Method 25A

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 1/30/2010.

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

Condition 1-4: Capping Monitoring Condition

Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2



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:

6NYCRR 201-6.1(a)
40CFR 63-JJ

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: 0NY100-00-0 HAP

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 owner shall ensure that cumulative emissions of Hazardous Air Pollutants (HAP), including those from permitted, exempt, and trivial sources, will remain less than 47,500 pounds during any consecutive 365 day period.



Facility owner shall maintain records that verify the facility's monthly HAP emissions. These records must be maintained at the facility for a period of five years.

Reports will be submitted annually, in a format acceptable to the commissioner's representative, which document that the facility's HAP emissions over any consecutive 365 day period were below 47,500 pounds. The annual reports must include information that documents the HAP emissions from each emission source at the facility, including exempt and trivial activities. The report must also include all emission factors and other data used in calculating the monthly HAP emissions.

Any noncompliance with the HAP emission limit in this condition must be reported by sending a copy of such record to the NYSDEC Region 6 within 30 days of the occurrence.

Parameter Monitored: HAP

Upper Permit Limit: 47,500 pounds per year

Reference Test Method: EPA Reference Method 18

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 1/30/2010.

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

Condition 8: Notification
Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 202-1.2

Item 8.1:

A person who is required by the commissioner to submit a stack test report shall notify the commissioner, in writing, not less than 30 days prior to the test, of the time and date of the test. Such notification shall also include the acceptable procedures to be used to stack test including sampling and analytical procedures. Such person shall allow the commissioner, or his representative, free access to observe stack testing being conducted by such person.

Condition 9: Acceptable procedures
Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 202-1.3(a)

Item 9.1:

Emission testing, sampling and analytical determinations to ascertain compliance with this Subchapter shall be conducted in accordance with test methods acceptable to the commissioner. The Reference Methods contained in part 60, appendix A and part 61, appendix B of title 40 of the Code of Federal Regulations and all future technical revisions, additions or corrections made



thereto shall be considered as acceptable test methods for those sources and contaminants for which they are expressly applicable, except where the commissioner has issued a specific method to be used instead of a Reference Method contained in these Federal regulations or where the commissioner determines that one or more alternate methods are also acceptable. The person who owns or operates an air contamination source shall submit the emission test report in triplicate, to the commissioner within 60 days after the completion of tests. In the event such source owner/operator can demonstrate to the commissioner such time is not sufficient, he may request in writing and be granted an extension. Where an opacity emission standard is applicable to the source tested, the emission test report shall include the opacity observation.

Condition 10: Separate emission test by the commissioner
Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 202-1.4

Item 10.1:

The commissioner may conduct separate or additional emission tests on the behalf of the State to ascertain compliance or noncompliance with any air pollution code, rule, or regulation.

Condition 11: Prohibitions
Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 202-1.5

Item 11.1:

No person shall conceal an emission by the use of air or other gaseous diluents to achieve compliance with an emission standard which is based on the concentration of a contaminant in the gases emitted through a stack.

Condition 1-5: Compliance Demonstration
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.4(c)

Item 1-5.1:

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

Emission Unit: 0-00002	Emission Point: 0000B
Emission Unit: 0-00003	Emission Point: 0000C
Emission Unit: 0-00003	Emission Point: 0000D
Emission Unit: 0-00003	Emission Point: 0000E
Emission Unit: 0-00003	Emission Point: 0000F
Emission Unit: 0-00003	Emission Point: 0000G
Emission Unit: 0-00003	Emission Point: 0000H



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

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particles are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions and on a dry gas basis.

Performance testing (EPA RM 5) is the only true method to prove compliance with this standard and shall be conducted at the discretion of the Department.

In the absence of a formal stack test, facility shall attest to compliance by visually monitoring and recording the exhaust plume from each involved emission point. These observations shall be recorded in a log book which shall be submitted annually and shall be retained for a five year period

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.05 grains per dscf
Reference Test Method: EPA Reference Method 5
Monitoring Frequency: DAILY
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2010.
Subsequent reports are due every 12 calendar month(s).

Condition 1-6: Compliance Demonstration
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 1-6.1:

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

Emission Unit: 0-00002 Emission Point: 0000B

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

Item 1-6.2:

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 process emission source subject to 6 NYCRR 201.

EPA Reference Method 9 is the only formal determinate of opacity compliance and the Department reserves the right to perform or require the performance of a RM9.

In the absence of a formal RM 9, facility shall attest to opacity compliance by visually monitoring and recording the magnitude of optical density of the exhaust plume from each referenced emission point. This observation shall be made once per day and while the source is operating. The observer shall not consider that portion of the plume that is due to water vapor. These observations shall be recorded in a log book which shall be submitted annually and shall be retained for a five year period.

If dense emissions (any that are greater than "clear" or "very minimal") are observed for two consecutive days, then facility shall:

- 1) Immediately investigate the root cause and take appropriate corrective action.
- 2) Conduct a certified EPA Reference Method 9 visible emission test
- 3) Notify the NYSDEC, Division of Air Resources, Region 6
- 4) If the Method 9 test determines that the opacity is less than 20%, then an appropriate log entry of "very minimal" shall be recorded.
- 5) If the RM9 certified observer detects opacity greater than 20%, then facility shall make such an entry in the log.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Reference Method 9

Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2010.

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

Condition 15: No hand firing of Bituminous coal
Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 227-1.1



Item 15.1: No person shall construct; install or modify, or cause to be constructed, installed or modified, any stationary combustion installation designed to burn bituminous coal, hand fired.

Condition 1-7: Compliance Demonstration

Effective between the dates of 05/01/2009 and Permit Expiration Date

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

Item 1-7.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001

Emission Point: 0000A

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20% opacity (6 minute average), except for one six-minute period per hour of not more than 27% opacity.

EPA Reference Method 9 is the only formal determinate of opacity compliance and the Department reserves the right to perform or require the performance of a RM9.

In the absence of a formal RM 9, facility shall attest to opacity compliance by visually monitoring and recording the magnitude of optical density of the exhaust plume from each referenced emission point. This observation shall be made once per day and while the source is operating. The observer shall not consider that portion of the plume that is due to water vapor. These observations shall be recorded in a log book which shall be submitted annually and shall be retained for a five year period.

If dense emissions (any that are greater than "clear" or "very minimal") are observed for two consecutive days, then facility shall:

- 1) Immediately investigate the root cause and take appropriate corrective action.
- 2) Conduct a certified EPA Reference Method 9 visible emission test



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 process emission source subject to 6 NYCRR 228.

EPA Reference Method 9 is the only formal determinate of opacity compliance and the Department reserves the right to perform or require the performance of a RM9.

In the absence of a formal RM 9, facility shall attest to opacity compliance by visually monitoring and recording the magnitude of optical density of the exhaust plume from each referenced emission point. This observation shall be made once per day and while the source is operating. The observer shall not consider that portion of the plume that is due to water vapor. These observations shall be recorded in a log book which shall be submitted annually and shall be retained for a five year period.

If dense emissions (any that are greater than "clear" or "very minimal") are observed for two consecutive days, then facility shall:

- 1) Immediately investigate the root cause and take appropriate corrective action.
- 2) Conduct a certified EPA Reference Method 9 visible emission test
- 3) Notify the NYSDEC, Division of Air Resources, Region 6
- 4) If the Method 9 test determines that the opacity is less than 20%, then an appropriate log entry of "very minimal" shall be recorded.
- 5) If the RM9 certified observer detects opacity greater than 20%, then facility shall make such an entry in the log.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Reference Method 9

Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2010.

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

Condition 1-12: Compliance Demonstration

Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.5(h)



Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Applicaton Specific Data

Condition 1-15: Compliance Demonstration

Effective between the dates of 05/01/2009 and Permit Expiration Date

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

Item 1-15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Any stationary combustion installation that is not subject to 6NYCRR section 227-1.2(b)(3), and is burning any of the following three fuels:

1. coal and/or wood;
2. coke;
3. or any solid fuel derived from coal

must limit particulate emissions into the outdoor atmosphere to meet the permissible emission rates specified in Table 1 of 6NYCRR Subpart 227-1.2(b). Monitoring to meet this limit shall be conducted as cited below.

Manufacturer Name/Model Number: Chiptec C6 gasifier/Boilersmith boiler

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.6 pounds per million Btus

Reference Test Method: Method 5 (40CFR60)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 36: Corrective Action

Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 227-1.6(c)

Item 36.1:

This Condition applies to Emission Unit: 0-00001



Item 36.2:

No person shall cause, permit, or allow the operation of any affected stationary combustion installation sealed by the commissioner in accordance with 6 NYCRR Part 227-1.6.

Condition 37: Corrective Action

Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 227-1.6(d)

Item 37.1:

This Condition applies to Emission Unit: 0-00001

Item 37.2:

No person except the commissioner or his representatives shall remove, tamper with or destroy any seal affixed to any stationary combustion installation in accordance with 6 NYCRR Part 227-1.6.

Condition 38: Fuel sampling.

Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 227-1.7(a)

Item 38.1:

This Condition applies to Emission Unit: 0-00001

Item 38.2:

Any stationary combustion installation described in section 6 NYCRR 227-1.2 of this Part, shall provide pertinent emissions data upon the commissioner's request.

Condition 1-16: Compliance Demonstration

Effective between the dates of 05/01/2009 and Permit Expiration Date

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

Item 1-16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Emission Point: 0000A

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of particulate matter (PM) from this emission point shall not exceed 0.60 lb/MMBtu.



A 12/15/04 stack test of the FE Hale boiler determined PM emissions to be 0.4347 lb/MMBtu and therefore compliant with the standard. Mod #0 had required routine RM5 re-tests of this boiler at a frequency of once per five year period. Mod #1 has rescinded this re-test requirement at NYSDEC discretion. Facility understands that the Department reserves the right to mandate further boiler stack testing for any reason (including poor boiler performance) per 6 NYCRR 202-1.1

Upper Permit Limit: 0.60 pounds per million Btus

Reference Test Method: EPA Reference Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ARITHMETIC MEAN

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-17: Compliance Demonstration
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.4(c)

Item 1-17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Weekly, operators of each spray booth must perform the following inspection:

- 1) Visually inspect the general vicinity of the emission point for evidence of paint fallout. Such fallout may be indicative of paint filter malfunction.
- 2) Visually inspect the spray booth filters, replace as necessary.
- 3) Monitor and log the pressure drop across the filter media and compare to normal baseline readings. Unusually low values suggest a filter breach or filter dislodgement; high values suggest a congested filter.
- 4) Determine root cause of any problems and take corrective action.



4) Maintain a written log that references each booth on the above inspection tasks. Log shall include date, time and inspector's name. Record the discovery of any problems/action items and include a description of the corrective action taken. Keep records for five years.

Reference Test Method: Facility designed operation & maintenance plan

Monitoring Frequency: WEEKLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2010.

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

Condition 1-18: Will remain subject to Part 228.
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.1(d)

Item 1-18.1:

This Condition applies to Emission Unit: 0-00003

Item 1-18.2:

Any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228 will remain subject to these provisions even if the annual potential to emit VOCs for the facility later falls below the thresholds set forth in 228.1(b).

Condition 1-19: Compliance Demonstration
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.5(a)

Item 1-19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-19.2:

Compliance Demonstration 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. Any facility required to perform the overall removal efficiency calculation, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance must be provided to the Department in a format acceptable to the Department.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-20: Department access to obtain samples.
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.5(d)

Item 1-20.1:

This Condition applies to Emission Unit: 0-00003

Item 1-20.2:

Representatives of the Department must be permitted during reasonable business hours, to obtain coating samples for the purpose of determining compliance with 6NYCRR Part 228.

Condition 1-21: Compliance Demonstration
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.6(b)

Item 1-21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

Item 1-21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any person selling a coating for use in a coating line subject to 6NYCRR Part 228 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-22: Compliance Demonstration
Effective between the dates of 05/01/2009 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 228.10

Item 1-22.1:

The Compliance Demonstration activity will be performed for:



Emission Unit: 0-00003

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of this facility subject to 6NYCRR 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 and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents.
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and

All associated coating line work area(s) within the facility shall be inspected daily to determine if there are any open containers present, and that only acceptable spray gun cleaning methods were utilized. A log book shall be maintained to record these inspections and their results. The log book shall include the following information:



- date and time of inspection
- items or areas observed
- corrective measures taken, if necessary

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2010.

Subsequent reports are due every 12 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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6NYCRR Part 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 55: Contaminant List

Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 55.1:

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

CAS No: 000067-56-1
Name: METHYL ALCOHOL

CAS No: 000098-82-8
Name: BENZENE, (1-METHYLETHYL)

CAS No: 000100-41-4
Name: ETHYLBENZENE

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 000110-54-3
Name: HEXANE

CAS No: 000111-90-0
Name: ETHANOL, 2- (2-ETHOXYETHOXY)

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

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

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

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

Condition 56: Unavoidable noncompliance and violations

Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-1.4

Item 56.1:

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 57: Emission Unit Definition

Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 57.1(From Mod 1):

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

Emission Unit: 0-00001

Emission Unit Description:



This emission unit consists of a 6.6 MMBtu/hr wood-fired boiler. The boiler, new in 2003, is a Chiptec C6 gasification unit which fires into a Boilersmith 3-pass steam boiler. This combination exhausts through a multi-cyclone (fly ash collection) that consists of four 11" diameter cyclones that are 35" long. A rooftop stack (0000A) is 20" in diameter. Sawdust and wood-chip fuel is auger-fed from a fuel bin. Fuel is generated onsite, but occasionally is bought or sold. The primary use of steam (15 psi) is to heat make-up air for coating operations, but also for plant-wide heat.

Building(s): 01

Item 57.2(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 a plant-wide wood dust/chip collection system that exhausts through an outdoor cyclone/baghouse separator; this unit is a Pneumafil RAF II (reverse air filter) Model# 13.5-460-12. Dust system collects shavings from various wood-machining stations. Cleaned exhaust air can be directed to emission point 0000B in summer (approx 115 day/yr), or back indoors in winter (and therefore not to 0000B)(approx 250 day/yr). Sawdust and chips are ducted directly to the boiler fuel bin. The cyclone is manufacturer-rated at 97.5% efficient and the baghouse at 99.96% efficient. Unit has 7,106 ft² cloth area and 46,000 cfm. The pressure drop across this unit is monitored and logged daily.

Building(s): 01

Item 57.3(From Mod 1):

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

Emission Unit: 0-00003

Emission Unit Description:

This emission unit consists of six spray booths that are located in a restricted-dust room. This coating operation has a warm air make-up unit. Various wood coatings are usually sprayed from either 5 or 55 gallon pots. Coatings are stored in an adjacent paint vault whose vent is exempt. Booths are equipped with filters. Six rooftop stacks are grouped near the front entrance of the building. Fifty-ton VOC cap enables facility to avoid the requirement to use 228-compliant (Table 2) coatings. Booth#, EP, Heading info: PB#1/0000D/SE, PB#2/0000G/SW, PB#3/0000H/E, PB#4/0000C/W, PB#5/0000E/NE, PB#6/0000F/NW

Building(s): 01

Condition 58: Air pollution prohibited



Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable State Requirement:6NYCRR 211.2

Item 58.1:

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 59: Compliance Demonstration

Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable State Requirement:6NYCRR 211.2

Item 59.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 59.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:

1. Have a complaint phone line available 24 hours a day, 7 days a week.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and any action taken.
5. Report in a format acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 61: Emission Point Definition By Emission Unit

Effective between the dates of 05/22/2002 and Permit Expiration Date



Applicable State Requirement:6NYCRR 201-5

Item 61.1(From Mod 1):

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

Emission Unit: 0-00001

Emission Point: 0000A

Height (ft.): 38

Diameter (in.): 20

NYTMN (km.): 4765.6

NYTME (km.): 493.202

Building: 01

Item 61.2(From Mod 1):

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

Emission Unit: 0-00002

Emission Point: 0000B

Height (ft.): 16

Length (in.): 60

Width (in.): 60

NYTMN (km.): 4765.54

NYTME (km.): 493.145

Building: 01

Item 61.3(From Mod 1):

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

Emission Unit: 0-00003

Emission Point: 0000C

Height (ft.): 34

Diameter (in.): 36

NYTMN (km.): 4765.529

NYTME (km.): 493.2

Building: 01

Emission Point: 0000D

Height (ft.): 34

Diameter (in.): 24

NYTMN (km.): 4765.519

NYTME (km.): 493.21

Building: 01

Emission Point: 0000E

Height (ft.): 34

Diameter (in.): 36

NYTMN (km.): 4765.536

NYTME (km.): 493.216

Building: 01

Emission Point: 0000F

Height (ft.): 34

Diameter (in.): 36

NYTMN (km.): 4765.539

NYTME (km.): 493.203

Building: 01

Emission Point: 0000G

Height (ft.): 34

Diameter (in.): 24

NYTMN (km.): 4765.52

NYTME (km.): 493.198

Building: 01

Emission Point: 0000H

Height (ft.): 34

Diameter (in.): 24

NYTMN (km.): 4765.525

NYTME (km.): 493.212

Building: 01

Condition 62: Process Definition By Emission Unit

Effective between the dates of 05/22/2002 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5



Item 62.1(From Mod 1):

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

Emission Unit: 0-00001

Process: BLR

Source Classification Code: 1-02-009-06

Process Description:

This process consists of the operation of a Chiptec C6 wood-fired boiler.

Emission Source/Control: 000AB - Combustion

Design Capacity: 6.6 million Btu per hour

Emission Source/Control: 000AA - Control

Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Item 62.2(From Mod 1):

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

Emission Unit: 0-00002

Process: DST

Source Classification Code: 3-07-008-05

Process Description:

This process consists of the operation of a cyclone/baghouse separator. This unit removes sawdust and wood chips from the airstream of the plant-wide dust collection system. Origin of wood dust: wood machining operations.

Emission Source/Control: 000BB - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: COLLT - Process

Item 62.3(From Mod 1):

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

Emission Unit: 0-00003

Process: WWW

Source Classification Code: 4-02-019-01

Process Description:

This process consists of the surface coating of wood furniture. Coating is performed in six spray booths, each operated with filters.

Emission Source/Control: 000CC - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 000DD - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 000EE - Control

Control Type: MAT OR PANEL FILTER

Emission Source/Control: 000FF - Control



Control Type: MAT OR PANEL FILTER

Emission Source/Control: 000GG - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 000HH - Control
Control Type: MAT OR PANEL FILTER

Emission Source/Control: 000II - Process

