PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-2126-00091/00001
Effective Date: 02/20/2015 Expiration Date: 02/19/2025

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

Contact: JAMES W PETERS
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

Description:
This effort is Renewal #1, for the purpose of bring in the new 10 year expiration date. Also the new Part 228 regulations are being corrected.

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: LAWRENCE R AMBEAU
NYSDEC - REGION 6
317 WASHINGTON ST
WATERTOWN, NY 13601

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

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

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

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

Item 4.1:
The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

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

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

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

Item 5.1:
Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 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

Permit Effective Date: 02/20/2015 Permit Expiration Date: 02/19/2025

LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS
Facility Level

1 6 NYCRR 201-3.1 (a): Exempt and Trivial Activities Applicability
2 6 NYCRR 201-3.2 (b): Exempt Activities - Maintenance of Control Equipment
3 6 NYCRR Subpart 201-7: Facility Permissible Emissions
*4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
*5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
6 6 NYCRR 202-1.2: Notification
7 6 NYCRR 202-1.4: Separate emission test by the commissioner
8 6 NYCRR 202-1.5: Prohibitions
9 6 NYCRR 211.1: Air pollution prohibited
10 6 NYCRR 212.4 (c): Compliance Demonstration
11 6 NYCRR 212.6 (a): Compliance Demonstration
12 6 NYCRR 227-1.1: No hand firing of Bituminous coal
13 6 NYCRR 227-1.3 (a): Compliance Demonstration
14 6 NYCRR 227-1.7 (b): Emissions data requirements.
15 6 NYCRR 228-1.1 (a) (3): Once in always in
16 6 NYCRR 228-1.3 (a): Compliance Demonstration
17 6 NYCRR 228-1.3 (d): Compliance Demonstration
18 6 NYCRR 228-1.3 (e) (2): Compliance Demonstration
19 6 NYCRR 228-1.4 (c) (3): Compliance Demonstration

Emission Unit Level

20 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

EU=0-00001

21 6 NYCRR 227-1.6 (c): Corrective Action
22 6 NYCRR 227-1.6 (d): Corrective Action
23 6 NYCRR 227-1.7 (a): Fuel sampling.

EU=0-00001,EP=0000A

24 6 NYCRR 227-1.2 (a) (4): Compliance Demonstration

EU=0-00003

25 6 NYCRR 212.4 (c): Compliance Demonstration

EU=0-00003,Proc=WWW

26 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS
Facility Level

27 ECL 19-0301: Contaminant List
28 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
29 6 NYCRR Subpart 201-5: Emission Unit Definition
30 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
31 6 NYCRR 201-5.3 (c): Compliance Demonstration
32 6 NYCRR 211.2: Visible Emissions Limited

33 6 NYCRR 211.2: Compliance Demonstration

Emission Unit Level

34 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
35 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.

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

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

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

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

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

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

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

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

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

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

required to operate such device effectively.

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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: **Exempt and Trivial Activities Applicability**

Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 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 02/20/2015 and 02/19/2025

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

Item 2.1:
The owner or operator of any emission source or activity that is listed as being exempt in 6 NYCRR Part 201-3.2(c), on the basis of the use of appropriate emission controls shall operate and maintain those controls in a manner consistent with manufacturer's specifications and good engineering practices.

Condition 3: Facility Permissible Emissions
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 3.1:
The sum of emissions from the emission units specified in this permit shall not equal or exceed the following
Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY100-00-0 Name: TOTAL HAP	PTE:	47,500	pounds per year
CAS No: 0NY998-00-0 Name: VOC	PTE:	95,000	pounds per year

Condition 4: Capping Monitoring Condition
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

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

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

Item 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 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 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 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 4.6:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: 0-00003
Process: WWW

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

Item 4.7:
Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
CAP:
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.
RECORDS:
Facility owner shall maintain records that verify the facility's monthly HAP emissions. These records shall be maintained at the facility for a minimum five year period.

REPORTS:
Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's HAP emissions over any consecutive 365 day period were maintained below 47,500 pounds. The annual reports shall include information that documents the HAP emissions from each emission source at the facility, including exempt and trivial activities. The report shall also include all emission factors and other data used in calculating the monthly HAP emissions. The form "Truth, Accuracy & Completeness" is required.
NONCOMPLIANCE:
Any noncompliance with the HAP emission limit in this condition shall be reported by sending a copy of such record to the NYSDEC Region 6 within 30 days of the occurrence.

Parameter Monitored: COATING LINES
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 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 5: Capping Monitoring Condition
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 5.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

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

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

Item 5.3:
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 5.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 5.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 5.6:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: 0-00001
Process: BLR

Emission Unit: 0-00003
Process: WWW

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

Item 5.7:
Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
CAP:
Facility owner shall ensure that the facility-wide 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. This 95,000 pound VOC cap is sufficiently high to render the requirements of Part 228 as applicable, therefore Hale is subject to the VOC-content limitations of Table C-2, among other requirements.

RECORDS:
Facility owner shall maintain records that verify the facility's monthly VOC emissions. These records shall be maintained at the facility for a minimum five year period. Reports will be submitted annually, in a format acceptable to the Department, which document that the facility's VOC emissions during any consecutive 365 day period were less than 95,000 pounds. At Hale, VOC emissions are expected to elute from the coating operation and from wood fuel

combustion.
REPORTS:
The annual monitoring report shall include information that documents the VOC emissions from each emission source at the facility, including exempt and trivial activities. The report shall also include all emission factors and other data used in calculating the monthly VOC emissions. The form "Annual Capping Certification" is required.
NONCOMPLIANCE:
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: COATING LINES
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 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 6: Notification
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 202-1.2

Item 6.1:
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 7: Separate emission test by the commissioner
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 202-1.4

Item 7.1:
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 8: Prohibitions
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 202-1.5

Item 8.1:

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 9: Air pollution prohibited
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 9.1:
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 10: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 10.1:
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 10.2:
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 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: Observe plume daily, perform RM 9 at DEC request
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 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 11: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 11.1:
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 11.2:
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: Observe plume daily, perform RM 9 at DEC request
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 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 12: No hand firing of Bituminous coal
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 227-1.1

Item 12.1: No person shall constuct; install or modify, or cause to be constructed, installed or modified, any stationary combustion installation designed to burn bituminous coal, hand fired.

Condition 13: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 13.1:
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 13.2:
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
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: Observe plume daily, perform RM 9 at DEC request
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 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 14: Emissions data requirements.
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 14.1:
Sampling, compositing, and analysis of fuel samples shall be conducted in accordance with methods acceptable to the commissioner.

Condition 15: Once in always in
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 228-1.1 (a) (3)

Item 15.1:
Any coating line that is or becomes subject to the provisions of Subpart 228-1 will remain subject to these provisions even if the annual potential to emit or actual emissions of VOCs for the facility later falls below the thresholds set forth in Subdivision 228-1.1(a).

Condition 16: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 16.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

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 16.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, excepting only the emission of uncombined water, in this case - the emission points (stacks) for a coating operation. The permittee will conduct DAILY observations of visible emissions from the emission points to which this condition applies. The observations shall be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Inclement weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry.
If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the Annual Monitoring Report required of all permittees shall include a copy of this log.

** NOTE ** Steam plumes generally form after leaving the

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

Upper Permit Limit: 20 percent
Reference Test Method: Observe plume daily, perform RM9 at DEC request
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 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 17: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 17.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: 0-00003
Process: WWW

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

Item 17.2:
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 a facility subject to this
Subpart must:
(a) use closed, non-leaking containers to store or dispose
of cloth or other absorbent applicators impregnated with
VOC solvents that are
used for surface preparation, cleanup or coating
removal;
(b) store in closed, non-leaking containers spent or fresh
VOC
solvents to be used for surface preparation, cleanup or
coating removal;
(c) not use VOC solvents to cleanup spray equipment unless

equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection
procedures require operational access. This provision does not apply
to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
(e) not use open containers to store or dispose of spent surface
coatings, or spent VOC solvents;
(f) minimize spills during the handling and transfer of coatings and
VOC solvents; and
(g) clean hand held spray guns by one of the following:
(1) an enclosed spray gun cleaning system that is kept closed when
not in use;
(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
(3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

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

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

Monitoring Frequency: WEEKLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 18: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 228-1.3 (e) (2)

Item 18.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: 0-00003
Process: WWW

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

Item 18.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
A facility containing a coating line (other than a class A coating line) may use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits set forth in section 228-1.4 ; provided such use is recorded on an as used basis and maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 19: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 228-1.4 (c) (3)

Item 19.1:
The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: 0-00003
Process: WWW

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

Item 19.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Per Table C-2, facility shall not exceed the following as-applied VOC-content limits:

Sealers: 1.9 lb VOC/lb solids
Topcoats: 1.8 lb VOC/lb solids
Acid cured alkyd amino vinyl sealers: 2.3 lb VOC/lb solids
Acid cured alkyd amino conversion topcoats: 2.0 lb VOC/lb solids

Monitoring Frequency: PER DELIVERY
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

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

Condition 20: Emission Unit Permissible Emissions
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 20.1:
The sum of emissions from all regulated processes specified in this permit for the emission unit cited
shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 0-00003

CAS No: 0NY100-00-0
Name: TOTAL HAP
PTE(s): 5.422 pounds per hour
47,500 pounds per year

CAS No: 0NY998-00-0
Name: VOC
PTE(s): 10.8 pounds per hour
95,000 pounds per year

Condition 21: Corrective Action
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 21.1:
This Condition applies to Emission Unit: 0-00001

Item 21.2:
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 22: Corrective Action
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 22.1:
This Condition applies to Emission Unit: 0-00001

Item 22.2:
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 23: Fuel sampling.
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 23.1:
This Condition applies to Emission Unit: 0-00001

Item 23.2:
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 24: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 24.1:
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 24.2:
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 25: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 25.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003

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

Item 25.2:
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 breech 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 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 26: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 26.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00003
Process: WWW

Item 26.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

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

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

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

4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.

5. Any additional information required to determine compliance with Part 228-1.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

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

Item A: **Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**
Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.

Condition 27: **Contaminant List**
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable State Requirement:ECL 19-0301

Item 27.1:
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: TOTAL HAP

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

Condition 28: Malfunctions and start-up/shutdown activities
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable State Requirement:6 NYCRR 201-1.4

Item 28.1:
(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

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

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

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

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

Condition 29: Emission Unit Definition
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 29.1:
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 29.2:
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 29.3:
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. Spray guns are all HVLP. Facility has not capped at 25 ton/yr and therefore is subject to the VOC-content limitations of Table C-2.Six rooftop stacks are grouped near the front entrance of the building. Booth#, EP, Compass 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 30: Renewal deadlines for state facility permits
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 30.1:
The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 31: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

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

Item 31.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 31.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 6
State Office Building
317 Washington Ave.
Watertown, NY 13601

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 32: Visible Emissions Limited
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable State Requirement:6 NYCRR 211.2

Item 32.1:
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 33: Compliance Demonstration
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable State Requirement:6 NYCRR 211.2

Item 33.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 33.2:
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 34: Emission Point Definition By Emission Unit
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 34.1:
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 34.2:
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 34.3:
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 35: Process Definition By Emission Unit
Effective between the dates of 02/20/2015 and 02/19/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 35.1:
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 35.2:
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 35.3:
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: 000JJ - Process