



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-2136-00012/00016
Mod 0 Effective Date: 01/28/2000 Expiration Date: No expiration date.
Mod 1 Effective Date: 07/06/2010 Expiration Date: No expiration date.

Permit Issued To: TUMBLE FORMS INC
1013 BARKER RD
DOLGEVILLE, NY 13329

Contact: JOHN DUREN
PATTERSON MEDICAL
W68N158 EVERGREEN BLVD
CEDARBURG, WI 53012
(262) 387-8731

Facility: TUMBLE FORMS
1013 BARKER RD
DOLGEVILLE, NY 13329

Contact: RON KARLA
TUMBLE FORMS INC
PO BOX 266 1013 BARKER RD
DOLGEVILLE, NY 13329
(315) 429-3101

Description:

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

Facility Level

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

DEC SPECIAL CONDITIONS

- Facility inspection by the department.



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: 6 NYCRR 621.11

Item 1-1.1:

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

Item 1-1.2:

The permittee must submit a renewal application at least 180 days before 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.



Department

Applicable State Requirement: 6 NYCRR 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 3: Applications for Permit Renewals and Modifications

Applicable State Requirement: 6 NYCRR 621.13 (a)

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.

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department

Applicable State Requirement: 6 NYCRR 621.14

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

**** Facility Level ****

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 6 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 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 Headquarters
Division of Environmental Permits
State Office Building, 317 Washington Street
Watertown, NY 13601-3787
(315) 785-2245

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

SUBOFFICE - UTICA

Applicable State Requirement: 6 NYCRR 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



DEC SPECIAL CONDITIONS

Condition 6: Facility inspection by the department.

Applicable State Requirement: ECL 3-0301 (2) (g)

Item 6.1:

New York State Department of Environmental Conservation

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Facility DEC ID: 6213600012



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To:TUMBLE FORMS INC
1013 BARKER RD
DOLGEVILLE, NY 13329

Facility: TUMBLE FORMS
1013 BARKER RD
DOLGEVILLE, NY 13329

Authorized Activity By Standard Industrial Classification Code:
3089 - PLASTICS PRODUCTS, NEC

Mod 0 Permit Effective Date: 01/28/2000
date.

Permit Expiration Date: No expiration
date.

Mod 1 Permit Effective Date: 07/06/2010
date.

Permit Expiration Date: No expiration
date.



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.1: Definitions Applicable To This Permit
- 5 6 NYCRR 201-1.2: Unpermitted Emission Sources
- 10 6 NYCRR 201-1.10 (a): Public Access to Recordkeeping
- 1-1 6 NYCRR 201-3.2 (c) (12): Graphic Arts Exemption
- 1-2 6 NYCRR 201-3.2 (c) (17): Surface Coating Exemption
- 1-3 6 NYCRR 201-7.2: Facility Permissible Emissions
- *1-4 6 NYCRR 201-7.2: Capping Monitoring Condition
- *1-5 6 NYCRR 201-7.2: Capping Monitoring Condition
- *1-6 6 NYCRR 201-7.2: Capping Monitoring Condition
- 1-7 6 NYCRR 212.4 (c): Compliance Demonstration
- 1-8 6 NYCRR 212.6 (a): Compliance Demonstration
- 1-9 40CFR 63.11416(f), Subpart OOOOOO: Compliance Demonstration
- 1-10 40CFR 63.11417(d), Subpart OOOOOO: Compliance Demonstration

Emission Unit Level

- 1-11 6 NYCRR 201-7.2: Emission Unit Permissible Emissions

EU=0-00013

- 1-12 40CFR 63.11416(e), Subpart OOOOOO: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 1-13 ECL 19-0301: Contaminant List
- 1-14 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 40 6 NYCRR Subpart 201-5: General Provisions
- 41 6 NYCRR Subpart 201-5: Emission Unit Definition
- 1-15 6 NYCRR 211.2: Air pollution prohibited
- 43 6 NYCRR 211.2: Air pollution prohibited
- 1-16 6 NYCRR 211.2: Compliance Demonstration

Emission Unit Level

- 46 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 47 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: Visible Emissions Limited - 6 NYCRR 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 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 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

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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.

Condition 1-1: Graphic Arts Exemption
Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-3.2 (c) (12)

Item 1-1.1:

The following activities are exempt from permitting requirements at non-title V facilities, but must be included in title V facility permit applications:

Screen printing inks/coatings or adhesives which are applied by a hand-held squeegee. A hand-held squeegee is one that is not propelled through the use of mechanical conveyance and is not an integral part of the screen printing process.

Condition 1-2: Surface Coating Exemption
Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-3.2 (c) (17)

Item 1-2.1:

The following activity is exempt from permitting requirements, but must be included in the Title V permit application: Surface coating and related operations which uses less than 25 gallons per month of coating materials (paints) and cleaning solvents, combined, subject to the following:

- (i) the facility is located outside of any severe ozone non attainment area; and
- (ii) all abrasive cleaning and surface coating operations are performed in an enclosed building where such operations are exhausted into appropriate emission control devices.

Condition 1-3: Facility Permissible Emissions
Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 1-3.1:

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

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

per year	CAS No: 000101-68-8	(From Mod 1)	PTE: 18,000 pounds
	Name: METHYLENE BISPHENYL ISOCYANATE		
per year	CAS No: 000584-84-9	(From Mod 1)	PTE: 18,000 pounds
	Name: BENZENE, 2,4-DIISOCYANATO-1-METHYL-		
per year	CAS No: 0NY100-00-0	(From Mod 1)	PTE: 40,000 pounds
	Name: HAP		

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CAS No: 0NY998-00-0 (From Mod 1) PTE: 90,000 pounds
per year

Name: VOC

Condition 1-4: Capping Monitoring Condition
Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 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:

6 NYCRR 201-6.1 (a)

Item 1-4.2:

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

Item 1-4.3:

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

Item 1-4.4:

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

Item 1-4.5:

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

Item 1-4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes



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

Monitoring Description:

Facility owner shall ensure that emissions of Volatile Organic Compounds (VOC), including those from permitted, exempt, and trivial sources, remain less than 90,000 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 90,000 pounds. The annual monitoring report must include information that documents the VOC emissions from each emission source at the facility (to include Processes 00B, COT, EST & RGD plus any other source), 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: 90,000 pounds per year

Reference Test Method: EPA Reference Test 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 1/30/2011.

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

Condition 1-5: Capping Monitoring Condition
Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 1-5.1:

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

6 NYCRR 201-6.1 (a)



40 CFR Part 63, Subpart III

Item 1-5.2:

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

Item 1-5.3:

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

Item 1-5.4:

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

Item 1-5.5:

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

Item 1-5.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 1-5.7:

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 40,000 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 minimum 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 40,000 pounds. The annual reports must include information that documents the HAP emissions from each emission source at the facility (to include Processes 00B, COT, EST & RGD plus any other source), 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: 40,000 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 1/30/2011.

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

Condition 1-6: Capping Monitoring Condition
Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 1-6.1:

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

6 NYCRR 201-6.1 (a)

40 CFR Part 63, Subpart III

Item 1-6.2:

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

Item 1-6.3:

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

Item 1-6.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the

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facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-6.5:

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

Item 1-6.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000101-68-8	METHYLENE BISPHENYL ISOCYANATE
CAS No: 000584-84-9	BENZENE, 2,4-DIISOCYANATO-1-METHYL-
CAS No: 0NY100-00-0	HAP

Item 1-6.7:

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 18,000 pounds during any consecutive 365 day period. Processes that are known to emit HAP are 00B, COT, EST & RGD, but other sources could exist.

Facility owner must maintain records that verify the facility's monthly HAP emissions. For other than isocyanate materials, 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 18,000 pounds. The report must also include all emission factors and other data used in calculating the monthly HAP emission. 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: 18,000 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 1/30/2011.
Subsequent reports are due every 12 calendar month(s).

Condition 1-7: Compliance Demonstration
Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 1-7.1:

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

Emission Unit: 0-00013	Emission Point: 00001
Emission Unit: 0-00013	Emission Point: 00002
Emission Unit: 0-00013	Emission Point: 00005
Emission Unit: 0-00013	Emission Point: 00007
Emission Unit: 0-00013	Emission Point: 00009
Emission Unit: 0-00013	Emission Point: 00010
Emission Unit: 0-00013	Emission Point: 00011
Emission Unit: 0-00013	Emission Point: 00012
Emission Unit: 0-00013	Emission Point: 00016
Emission Unit: 0-00013	Emission Point: 00060
Emission Unit: 0-00013	Emission Point: 00080

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

New York State Department of Environmental Conservation

Permit ID: 6-2136-00012/00016

Facility DEC ID: 6213600012



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 weekly 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: WEEKLY
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2011.
Subsequent reports are due every 12 calendar month(s).

Condition 1-8: Compliance Demonstration
Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 1-8.1:

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

Emission Unit: 0-00013	Emission Point: 00001
Emission Unit: 0-00013	Emission Point: 00002
Emission Unit: 0-00013	Emission Point: 00005
Emission Unit: 0-00013	Emission Point: 00007
Emission Unit: 0-00013	Emission Point: 00009
Emission Unit: 0-00013	Emission Point: 00010
Emission Unit: 0-00013	Emission Point: 00011
Emission Unit: 0-00013	Emission Point: 00012

New York State Department of Environmental Conservation

Permit ID: 6-2136-00012/00016

Facility DEC ID: 6213600012



Emission Unit: 0-00013

Emission Point: 00016

Emission Unit: 0-00013

Emission Point: 00060

Emission Unit: 0-00013

Emission Point: 00080

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any 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 week 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 sitings, 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

New York State Department of Environmental Conservation

Permit ID: 6-2136-00012/00016

Facility DEC ID: 6213600012



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Existing area-source generators of flexible polyurethane foam (molding operations) shall maintain records of information used to demonstrate compliance, as required in 40CFR63.11416(f), as follows: You must maintain these records for 5 years, with the last 2 years retained onsite. The remaining 3 years of data may be retained off site.

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 1/30/2011.

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

**** Emission Unit Level ****

Condition 1-11: Emission Unit Permissible Emissions Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 1-11.1:

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: 0-00013

CAS No: 0NY998000 (From Mod 1)

Name: VOC

PTE(s): 90,000 pounds per year

Condition 1-12: Compliance Demonstration Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63.11416(e), Subpart

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Item 1-12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00013

Item 1-12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

New York State Department of Environmental Conservation

Permit ID: 6-2136-00012/00016

Facility DEC ID: 6213600012



Monitoring Description:

Owners or operators of a new or existing flexible polyurethane foam fabrication affected source must not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process. Compliance may be demonstrated by using adhesive usage records, Material Safety Data Sheets, and engineering calculations.

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 1/30/2011.

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 - 6 NYCRR 201-1.10 (a)

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 1-13: Contaminant List

Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 1-13.1:

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

CAS No: 000101-68-8

Name: METHYLENE BISPHENYL ISOCYANATE

CAS No: 000584-84-9

Name: BENZENE, 2,4-DIISOCYANATO-1-METHYL-

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 1-14: Unavoidable noncompliance and violations

Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-14.1:

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 40: General Provisions

Effective between the dates of 01/28/2000 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 40.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 40.2:

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.

Item 40.3:

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.



Condition 41: Emission Unit Definition
Effective between the dates of 01/28/2000 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 41.1(From Mod 1):

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

Emission Unit: 0-00013

Emission Unit Description:

This emission unit consists of all manufacturing operations at this facility. Molded polyurethane foam items are produced by some or all of the following operations: 1) elastomeric urethane, 2) flexible polyurethane foam, 3) rigid polyurethane foam and 4) casted elastomer. Other manufacturing operations are also included in this emission unit: The SOL (assembly operations that utilize miscellaneous solvents) process and the WOD (woodworking shop) process. 40 CFR 63-000000 applies to this facility: Facility is a "molded foam source" and is a "fabrication source".

Building(s): 00013

Condition 1-15: Air pollution prohibited
Effective between the dates of 07/06/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 1-15.1:

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 43: Air pollution prohibited
Effective between the dates of 01/28/2000 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 43.1:

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 1-16: Compliance Demonstration
Effective between the dates of 07/06/2010 and Permit Expiration Date



Applicable State Requirement:6 NYCRR 211.2

Item 1-16.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-16.2:

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: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

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

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

**Condition 46: Emission Point Definition By Emission Unit
Effective between the dates of 01/28/2000 and Permit Expiration Date**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 46.1(From Mod 1):

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

Emission Unit: 0-00013

Emission Point: 00001

Height (ft.): 29

Diameter (in.): 24

NYTMN (km.): 4770.797 NYTME (km.): 518.018 Building: 00013



Emission Point: 00002
Height (ft.): 18 Diameter (in.): 24
NYTMN (km.): 4770.797 NYTME (km.): 518.025 Building: 00013

Emission Point: 00005
Height (ft.): 24 Diameter (in.): 24
NYTMN (km.): 4770.774 NYTME (km.): 518.035 Building: 00013

Emission Point: 00007
Height (ft.): 24 Diameter (in.): 24
NYTMN (km.): 4770.774 NYTME (km.): 518.043 Building: 00013

Emission Point: 00009
Height (ft.): 25 Diameter (in.): 24
NYTMN (km.): 4770.516 NYTME (km.): 518.058 Building: 00013

Emission Point: 00010
Height (ft.): 25 Diameter (in.): 24
NYTMN (km.): 4770.775 NYTME (km.): 518.062 Building: 00013

Emission Point: 00011
Height (ft.): 25 Diameter (in.): 42
NYTMN (km.): 4770.774 NYTME (km.): 517.999 Building: 00013

Emission Point: 00012
Height (ft.): 19 Diameter (in.): 24
NYTMN (km.): 4770.796 NYTME (km.): 518.014 Building: 00013

Emission Point: 00016
Height (ft.): 20 Length (in.): 8 Width (in.): 8
NYTMN (km.): 4770.801 NYTME (km.): 518.003 Building: 00013

Emission Point: 00060
Height (ft.): 25 Diameter (in.): 24
NYTMN (km.): 4770.774 NYTME (km.): 518.039 Building: 00013

Emission Point: 00080
Height (ft.): 25 Diameter (in.): 24
NYTMN (km.): 4770.775 NYTME (km.): 518.053 Building: 00013

Condition 47: Process Definition By Emission Unit
Effective between the dates of 01/28/2000 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 47.1(From Mod 1):

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

Emission Unit: 0-00013
Process: 00B Source Classification Code: 3-08-008-02
Process Description:
This process consists of the application of (in one spray

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booth) flexible polyurethane foam into split molds, to manufacture "shapes". This open-cell foam is formed from the reaction of isocyanate (Bayfit 554A) and polyol (Bayfit 554B); isocyanate is largely TDI. TDI emissions shall be calculated and recorded as follows: TDI emission factor is 25 grams of TDI emitted per US ton of isocyanate (Bayfit 554A) dispensed. Bayfit 554A shall conservatively be assumed to be 100% TDI. TDI is both a VOC and a HAP. It is this molding process that makes 40CFR63-000000 applicable to Tumble Forms.

Emission Source/Control: 00011 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0011A - Process

Item 47.2(From Mod 1):

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

Emission Unit: 0-00013

Process: COT

Source Classification Code: 3-08-008-02

Process Description:

This process consists of the application, in any one of six spray booths, of elastomeric urethane foam onto previously molded flexible polyurethane foam "shapes". This process resembles the the application of a pigmented coating with an airless spray gun; however is not considered to be a Part 228 regulated surface coating line due to the extent of the polymerization reaction and the minimal evaporative release of VOCs. This closed-cell elastomeric urethane is formed from the reaction of isocyanate (Mondur CD) and polyol; the isocyanate is largely MDI. MDI emissions shall be calculated and recorded as follows: MDI emission factor is 5.5 grams of MDI emitted per US ton of isocyanate (Mondur CD) applied to the surface of foam shapes. Mondur CD shall conservatively be assumed to be 100% MDI. MDI is both a VOC and a HAP. This process is not recognized to be "flexible polyurethane foam".

Emission Source/Control: 00005 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00006 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00007 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00008 - Control
Control Type: FABRIC FILTER



Emission Source/Control: 00009 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00010 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0005A - Process

Emission Source/Control: 0006A - Process

Emission Source/Control: 0007A - Process

Emission Source/Control: 0008A - Process

Emission Source/Control: 0009A - Process

Emission Source/Control: 0010A - Process

Item 47.3(From Mod 1):

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

Emission Unit: 0-00013

Process: EST

Source Classification Code: 3-08-008-02

Process Description:

This process consists of the formation of a casted elastomer. Due to low throughput quantities, casted elastomer is generated without a spray booth or an emission point. These closed-cell foam products are dense and rubbery. Elastomer is formed from the reaction of isocyanate (Mondur CD) and polyol; the isocyanate is largely MDI. MDI emissions shall be calculated and recorded as follows: MDI emission factor is 5.5 grams of MDI emitted per US ton of isocyanate (Mondur CD) dispensed. Mondur CD shall conservatively be assumed to be 100% MDI. MDI is both a VOC and a HAP. This process is not recognized as "flexible polyurethane foam".

Emission Source/Control: 00017 - Process

Item 47.4(From Mod 1):

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

Emission Unit: 0-00013

Process: RGD

Source Classification Code: 3-08-008-02

Process Description:

This process consists of the formation molded items (a sphere) from rigid polyurethane foam. Due to low throughput quantities, this closed-cell foam is generated without a spray booth or emission point. Rigid polyurethane foam is formed from the reaction of isocyanate (Mondur MR) and polyol; isocyanate is largely MDI. MDI emissions shall be calculated and recorded as



follows: MDI emission factor is 5.5 grams of MDI emitted per US ton of isocyanate (Mondur MR) dispensed. Mondur MR shall conservatively be assumed to be 100% MDI. MDI is both a VOC and a HAP. This process is not recognized to be "flexible polyurethane foam".

Emission Source/Control: 00017 - Process

Item 47.5(From Mod 1):

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

Emission Unit: 0-00013

Process: SOL

Source Classification Code: 4-01-888-01

Process Description:

This process consists of various and miscellaneous clean-up solvents, adhesives, waxes, resins, hand-applied coatings and hand/squeegee-applied ink, etc. Each of these products is used in sufficiently small quantities that the Department has elected to group their usage without the involvement of Parts 226, 228 or 234. Coating is exempt due to paint/solvent usage at less than 25 gal/month. Generally, this process emits fugitive emissions (no source or EP), but in some applications emits from 3 spray booths that are associated with emission points 00001, 00002 & 00012.

Emission Source/Control: 00001 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00002 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00012 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0001A - Process

Emission Source/Control: 0002A - Process

Emission Source/Control: 0012A - Process

Item 47.6(From Mod 1):

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

Emission Unit: 0-00013

Process: WOD

Source Classification Code: 3-07-030-98

Process Description:

This process consists of a woodworking shop where various wood inserts are cut and prepared. These wood inserts can be embedded into foam shapes in other processes. This process has a wood dust collection system that exhausts to a Torit baghouse (49 bags, Model #49P JD8) that is located



outside. PM emissions are released through EP 00013.

Emission Source/Control: 00016 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0016A - Process

