



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 6-3013-00065/00016
Effective Date: 03/11/2011 Expiration Date: 03/10/2016

Permit Issued To: VARFLEX CORP
512 W COURT ST
ROME, NY 13440-4010

Contact: DANIEL BURGDORF
VARFLEX CORPORATION
512 W COURT ST
ROME, NY 13440
(315) 336-4400

Facility: VARFLEX CORPORATION
512 W COURT ST
ROME, NY 13440

Contact: BRIAN D PERRY
VARFLEX
512 W COURT ST
ROME, NY 13440
(315) 336-4400

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

Facility Level

- Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA



DEC GENERAL CONDITIONS

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

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 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 to the Department for approval.



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 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



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.5 (a) (7): Fees
- 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6 NYCRR 202-2.1: Compliance Certification
- 6 6 NYCRR 202-2.5: Recordkeeping requirements
- 7 6 NYCRR 215.2: Open Fires - Prohibitions
- 8 6 NYCRR 200.7: Maintenance of Equipment
- 9 6 NYCRR 201-1.7: Recycling and Salvage
- 10 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 11 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 12 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 13 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
- 14 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
- 15 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
- 16 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
- 17 6 NYCRR 202-1.1: Required Emissions Tests
- 18 6 NYCRR 211.3: Visible Emissions Limited
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 23 6 NYCRR 201-6.5 (e): Compliance Certification
- 24 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 25 6 NYCRR 201-7.2: Facility Permissible Emissions
- *26 6 NYCRR 201-7.2: Capping Monitoring Condition
- 27 6 NYCRR 212.3 (b): Compliance Certification
- 28 6 NYCRR 212.6 (a): Compliance Certification
- 29 6 NYCRR 226.3 (a): Compliance Certification
- 30 6 NYCRR 228-1.1 (d): Will remain subject
- 31 6 NYCRR 228-1.2 (b) (35): Compliance Certification
- 32 6 NYCRR 228-1.3 (c): Compliance Certification
- 33 6 NYCRR 228-1.4: Compliance Certification
- 34 6 NYCRR 228-1.5 (a): Compliance Certification
- 35 6 NYCRR 228-1.5 (c): Compliance Certification
- 36 6 NYCRR 228-1.5 (f): Compliance Certification
- 37 6 NYCRR 228-1.5 (g) (2): Compliance Certification
- 38 6 NYCRR 228-1.5 (h): Compliance Certification
- 39 6 NYCRR 228-1.5 (j): Compliance Certification
- 40 6 NYCRR 228-1.7: Compliance Certification
- 41 6 NYCRR 228-1.10: Compliance Certification
- 42 40CFR 63.6(e)(1)(i), Subpart A: Operation and Maintenance Requirements
- 43 40CFR 63.6(e)(3), Subpart A: Startup, Shutdown and Malfunction



- 44 40CFR 63.4292(b), Subpart OOOO: Compliance Certification
- 45 40CFR 63.4293(a), Subpart OOOO: Compliance Certification
- 46 40CFR 63.4332, Subpart OOOO: Compliance Certification
- 47 40CFR 63.4364(c), Subpart OOOO: Compliance Certification
- 48 40CFR 63.4364(e), Subpart OOOO: Compliance Certification

Emission Unit Level

- 49 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 50 6 NYCRR Subpart 201-6: Process Definition By Emission Unit
- 51 40CFR 63.4293(b), Subpart OOOO: Compliance Certification

EU=1-COAT1,Proc=PN3

- 52 40CFR 63.4342, Subpart OOOO: Compliance Certification
- 53 40CFR 63.4342, Subpart OOOO: Compliance Certification

EU=1-COAT1,Proc=PN3,ES=RTO#1

- 54 40CFR 63.4364(b), Subpart OOOO: Compliance Certification
- 55 40CFR 63.4364(e), Subpart OOOO: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 56 ECL 19-0301: Contaminant List
- 57 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 58 6 NYCRR 211.2: Air pollution prohibited
- 59 6 NYCRR 211.2: Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 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 B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.3 (a) (4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR 201-6.3 (d) (12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR 201-6.5 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.5 (a) (3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5 (a) (5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.5 (a) (6)

This permit does not convey any property rights of any sort or any exclusive privilege.



Item I: Severability - 6 NYCRR 201-6.5 (a) (9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR 201-6.5 (g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR 201-6.5 (i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is



three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York



(NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

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

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees
Effective between the dates of 03/11/2011 and 03/10/2016

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

Item 2.1:
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 03/11/2011 and 03/10/2016

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

Item 3.1:



The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 03/11/2011 and 03/10/2016

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

Item 4.1:

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

Condition 5: Compliance Certification

Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement: 6 NYCRR 202-2.1

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air



Resources, Bureau of Air Quality Planning, 625 Broadway,
Albany NY 12233-3251

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 6: Recordkeeping requirements
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 6.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 7: Open Fires - Prohibitions
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 215.2

Item 7.1:

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 7.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended



until extinguished.

(g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.

(h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.

(i) Prescribed burns performed according to Part 194 of this Title.

(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

**Condition 8: Maintenance of Equipment
Effective between the dates of 03/11/2011 and 03/10/2016**

Applicable Federal Requirement:6 NYCRR 200.7

Item 8.1:

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

**Condition 9: Recycling and Salvage
Effective between the dates of 03/11/2011 and 03/10/2016**

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 9.1:

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 the ECL.

Condition 10: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 10.1:

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.

Condition 11: Exempt Sources - Proof of Eligibility

Effective between the dates of 03/11/2011 and 03/10/2016

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

Item 11.1:

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 this Subpart. 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 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 12: Trivial Sources - Proof of Eligibility

Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 12.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. 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 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 13: Standard Requirement - Provide Information

Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (4)

Item 13.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for



modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 14: General Condition - Right to Inspect
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (8)

Item 14.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 15: Standard Requirements - Progress Reports
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 201-6.5 (d) (5)

Item 15.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 16: Off Permit Changes
Effective between the dates of 03/11/2011 and 03/10/2016

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

Item 16.1:

No permit revision will be required for operating changes that contravene an express permit

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 20: Recycling and Emissions Reduction
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 82, Subpart F

Item 20.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 21: Emission Unit Definition
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 21.1:

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

Emission Unit: 1-COAT1

Emission Unit Description:

This emission unit consists of the RTO-controlled web coating operations which occur in the North Tower Room.

This room utilizes one emission point, the exhaust stack for the RTO. Process PN2 and/or PN3 may be utilized in this emission unit.

Building(s): North Room
Yard

Item 21.2:

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

Emission Unit: 2-COAT2

Emission Unit Description:



The emission unit consists of the uncontrolled web coating operations which occur in the South Tower Room. This room utilizes four emission points. Process PS2 may be utilized in this emission unit.

Building(s): South Room

Item 21.3:

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

Emission Unit: 3-COAT3

Emission Unit Description:

This emission unit consists of the coating and curing of non-web "rods", which is performed in the Rod Room. Due to the non-web substrate, Subpart OOOO will never apply to the operations of this emission unit. Either Process PR1 or PR2 may be utilized in this emission unit. This emission unit does not utilize any VOC/HAP control device.

PR1: When PR1 is utilized, the operations of this emission unit are exempt from Part 228 as this sleeving is manufactured for the aerospace industry for electric/radiation effects per 6 NYCRR 228.1(e)(7). Secondly, per 6 NYCRR 228.1(e)(6), Part 228 does not apply to the operations of this emission unit as these coatings are manually-applied with a brush and a roller die.

PR2: PR2 is utilized when these rods are not for aerospace uses. When PR2 is selected, Varflex chooses to fully comply with Part 228.

Complying with Part 228 entails that:

- 1) As-applied coatings shall comply (≤ 2.9 lbs/gal less water & less exempt VOC) with 6 NYCRR 228.7
- 2) Coating area inspections are required for open-container and wet rags per 6 NYCRR 228.10
- 3) Emission point opacity will be enforced via 6 NYCRR 228.4

Building(s): RodOvenRms

Item 21.4:

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

Emission Unit: 4-COAT4

Emission Unit Description:

This emission unit consists of two distinct clean-up functions:

- A) Two cold-cleaning degreasing units are used to wash impellers, shafts, etc that had been used in the Mix Room to blend coatings during the formulation process. The units are trivial per 6 NYCRR 201-3.3(c)(51) as each sink basin, when filled with regard for the "max fill line" badge, will not hold more than two gallons. The solvent



used is xylene, which is permissible per 6NYCRR226.3(a).

B) The operation of one distillation unit in the Creel Room, known as process DIS. A coating residue & xylene mixture is distilled to separate the two. Xylene is available for re-use and still bottoms are shipped for professional disposal. The origin of the inputted sludge is from two sources. One source is item "A", above. The other source is from containers and tower equipment/parts that had undergone physical cleaning in the PTE of the North Tower Room.

Note: Per 40CFR63.4282(b) and per 40CFR63.4293(b)(5), North Tower Room equipment/parts are cleaned in the North Tower Room only. Only liquid clean-up sludges are brought into emission unit 4-COAT4 for distillation.

Building(s): Creel Room
Mix Room

Condition 22: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

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

Item 22.1:

The Compliance Certification activity will be performed for the Facility.

Item 22.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 90 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that



definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal



regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 23: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

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

Item 23.1:
The Compliance Certification activity will be performed for the Facility.

Item 23.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Requirements for compliance certifications with terms and



conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due after the anniversary date of four consecutive calendar quarters as specified below. The first report is due after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.
- iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866



The address for the RAPCE is as follows:

State Office Building
317 Washington Street
Watertown, NY 13601-3787

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2012.
Subsequent reports are due on the same day each year

Condition 24: Non Applicable requirements
Effective between the dates of 03/11/2011 and 03/10/2016

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

Item 24.1:

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

6 NYCRR 226.2 (g)

Reason: Facility operates four cold-cleaning degreasing units, a remote-reservoir cold cleaning degreasing unit, which is trivial per 6NYCRR 201-3.3(c)(49), a freeboard-regulated degreaser which is exempt per 6 NYCRR 201-3.2(c)(39) and two non-remote reservoir units that hold less than two gallons each [trivial per 6NYCRR 201-3.3(c)(51)]. The latter two may utilize xylene (vapor pressure = 7mmHg) due to 2 gallon capacity. Varflex shall calculate degreaser VOC and HAP emissions from solvent usage records and current MSDS information. Degreaser emissions shall be separately itemized and then added into total facility VOC/HAP emissions on the Semi-Annual Monitoring Report. MSDS shall be retained onsite. Records shall be maintained for a minimum five year period.

6 NYCRR 228-1.1 (e) (7)

Reason: The requirements of Part 228 do not apply to those aerospace coatings that are utilized for pretreatment, electric/radiation effects or fuel tanks. The application of coatings to most of the rods, in the Rod Room have been determined to be "aerospace" in their usage.



40 CFR Part 63, Subpart HHHHHH

Reason: During the application phase of Renewal #2, Varflex formulated all coatings without the inclusion of "target HAPs" (per Subpart HHHHHH) which are the compounds of cadmium, chromium, lead, manganese and nickel; therefore Subpart HHHHHH did not apply. 40 CFR 63 Subpart HHHHHH will not apply to Varflex unless a target HAP is to appear in any coating or if the facility utilizes a methylene chloride de-painting product.

40 CFR Part 64

Reason: Compliance Assurance Monitoring (CAM Rule) has been deemed to be NOT APPLICABLE to Varflex Corp as the EPA relevant standard, 40 CFR 63-Subpart OOOO was proposed after the applicability threshold date of 11/15/90.

Condition 25: Facility Permissible Emissions
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 25.1:

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

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

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

PTE: 98,000 pounds per year

Condition 26: Capping Monitoring Condition
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 201-7.2

Item 26.1:

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 212.10 (a) (2)
6 NYCRR 228-1.1 (b) (5)

Item 26.2:

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

Item 26.3:

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.

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



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 26.4:

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 26.5:

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 26.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 26.7:

Compliance Certification 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 98,000 pounds during any consecutive 365 day period.

Facility owner shall maintain records that verify the facility's monthly VOC emissions. These records must be maintained at the facility for a minimum five-year period.

Reports will be submitted Semi-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 98,000 pounds. Each Semi-annual monitoring report must include information that documents the VOC emissions from each emission source at the facility, including exempt and trivial activities. The report must also include all emission factors and other data used in calculating the monthly VOC emissions.

The Department can require stack testing to verify VOC

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



emissions; in such an event, Reference Method 25A shall be utilized.

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: 98,000 pounds per year

Reference Test Method: EPA Reference Method 25A

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

Condition 27: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement: 6 NYCRR 212.3 (b)

Item 27.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 3-COAT3 Emission Point: EPOV1

Emission Unit: 3-COAT3 Emission Point: EPOV2

Emission Unit: 3-COAT3 Emission Point: EPOV4

Emission Unit: 3-COAT3 Emission Point: EPOV5

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

Item 27.2:

Compliance Certification 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 0.15 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions and on a dry gas basis.

In the absence of a formal stack test (EPA RM's 1 through 5), facility shall attest to compliance by visually monitoring and recording the exhaust plume from each

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



involved emission point. These observations shall be recorded once per week in a log book which shall be submitted semi-annually and shall be retained for a minimum five-year period.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.15 grains per cubic foot
Reference Test Method: EPA Reference Methods 1 thru 5
Monitoring Frequency: WEEKLY
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 28: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 28.1:

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

Emission Unit: 3-COAT3	Emission Point: EPOV1
Emission Unit: 3-COAT3	Emission Point: EPOV2
Emission Unit: 3-COAT3	Emission Point: EPOV4
Emission Unit: 3-COAT3	Emission Point: EPOV5

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

Item 28.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any process emission source subject to 6 NYCRR 201.

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 water vapor. These observations shall be recorded in a log book which shall be submitted semi-annually and shall be retained for a minimum five-year period.

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

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

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Reference Method 9
Monitoring Frequency: WEEKLY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement: 6 NYCRR 226.3 (a)

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Requirements for Cold Cleaning Degreasers including exempt and/or trivial units

A. Equipment Specifications when the internal volume of the cold cleaner is greater than two gallons.



The following types of control equipment must be used when conducting cold cleaning degreasing, solvent metal cleaning:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical.
- (3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. This does not apply to remote reservoir degreasers.
- (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.

B. Operating Requirements:

When cold cleaning, the clean parts must be drained at least 15 seconds or until dripping ceases.

C. General Requirements:

A Person conducting solvent metal cleaning must:

- (1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
- (2) Maintain equipment to minimize leaks and fugitive emissions.
- (3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
- (4) Keep the degreaser cover closed except when:
 - (a) parts are being placed into or being removed from the degreaser;
 - (b) adding or removing solvent from the degreaser;
 - (c) no solvent is in the degreaser; or
 - (d) when manually cleaning metal parts in the cold cleaning degreaser.
- (5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
- (6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.
- (7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation



acceptable to the Department may be used to comply with this requirement.

- (a) the name and address of the solvent supplier;
- (b) the type of solvent including the product or vendor identification number; and
- (c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

(8) Include in the semiannual monitoring report and annual compliance certifications (required of all permittees subject to Title V) the solvent consumption required under (5) above, as well as a statement that the permittee's obligations under items (1) through (7) above have been met for the period of the report or certification.. This statement must be based on the permittees observations on a daily basis that the operation of the solvent metal cleaning process has met the above criteria. The permittee must maintain a log of instances when the above have not been met, and such statement must summarize these instances.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

Condition 30: Will remain subject
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 228-1.1 (d)

Item 30.1:

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

Condition 31: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 228-1.2 (b) (35)

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

For all surface coatings subject to 6NYCRR Part 228, the VOC content (as applied, minus water and exempt VOC), must be less than or equal to the limit specified in Table 1 or Table 2 for the respective surface that is coated.

The VOC content of a coating, as applied, shall be calculated as follows:

$$(\text{VOC})_a = [(\text{Wv})_a - (\text{Ww})_a - (\text{We})_a] / [1 - \{ (\text{Vw})_a + (\text{Ve})_a \}]$$

Where:

(VOC)_a = VOC content of a coating, as applied, expressed as pounds of VOC per gallon of coating minus water and excluded VOC

(Wv)_a = The pounds of total volatiles per gallon of an as applied coating

(Ww)_a = The pounds of water per gallon of an as applied coating

(We)_a = The pounds of excluded VOC per gallon of an as applied coating

(Vw)_a = The gallons of water per gallon of an as applied coating

(Ve)_a = The gallons of excluded VOC per gallon of an as applied coating

Reference Test Method: EPA Method 24

Monitoring Frequency: MONTHLY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

Condition 32: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

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

Item 32.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-COAT1

Process: PN2

Emission Source: RTO#1

Emission Unit: 1-COAT1

Process: PN3

Emission Source: RTO#1

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



CAS No: 0NY998-00-0 VOC

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Any VOC oxidizer used as a control device must be designed and operated to provide at a minimum, an 85% overall removal efficiency (DRE). Varflex shall perform VOC destruction efficiency testing at least once during the term of each five-year Title V Permit.

Parameter Monitored: VOC

Lower Permit Limit: 85 percent reduction by weight

Reference Test Method: EPA Reference Method 204 & 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 33: Compliance Certification

Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 228-1.4

Item 33.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-COAT1 Emission Point: EP000

Emission Unit: 2-COAT2 Emission Point: EP001

Emission Unit: 2-COAT2 Emission Point: EP002

Emission Unit: 2-COAT2 Emission Point: EP003

Emission Unit: 2-COAT2 Emission Point: EP006

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 33.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any process emission source subject to 6 NYCRR 228.



In the absence of a formal RM 9, Varflex 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 semi-annually and shall be retained for a minimum five-year period.

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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Reference Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

Condition 34: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 228-1.5 (a)

Item 34.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 34.2:

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the Department and, upon request, these records must be submitted to the Department. Any facility required to perform the overall removal efficiency calculation, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance must be provided to the Department in a format acceptable to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

Condition 35: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 228-1.5 (c)

Item 35.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-COAT1

Emission Unit: 2-COAT2

Emission Unit: 3-COAT3

Emission Unit: 4-COAT4

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 35.2:

Compliance Certification shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

As Varflex formulates/manufactures its own coatings onsite, the facility shall maintain records that are equivalent to MSDS and/or TDS sheets (deemed to be highly confidential). These records shall list all known hazardous ingredients, which would include any HAPs and VOCs. These sheets shall indicate constituent percentages, VOC-content (for 228.7 applicability), HAP weight content per weight of solids applied (for MACT applicability) and elutable VOC per unit of coating (for emissions calculations). These records have been built into an Excel spreadsheet; NYSDEC has approved these records in lieu of "manufacturer-supplied" MSDS and RM24/RM311. The Department reserves the right to reverse this approval and then to require RM24 lab testing or some other MSDS/TDS.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 36: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement: 6 NYCRR 228-1.5 (f)

Item 36.1:

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

Emission Unit: 1-COAT1	
Process: PN2	Emission Source: RTO#1
Emission Unit: 1-COAT1	
Process: PN3	Emission Source: RTO#1

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner and/or operator of a surface coating process must follow notification requirements, protocol requirements and test procedures of Part 202 of this Title for testing and monitoring. Depending upon conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 (see Table 1, section 200.9 of this Title) must be used when measuring VOC concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:



(1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;

(2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or

(3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

Reference Test Method: EPA Reference Method 25A
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 37: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement: 6 NYCRR 228-1.5 (g) (2)

Item 37.1:

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

Emission Unit: 1-COAT1
Process: PN2 Emission Source: RTO#1

Emission Unit: 1-COAT1
Process: PN3 Emission Source: RTO#1

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

Item 37.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Proper capture and control of coating-generated VOC emissions is required.

The CMM regenerative thermal oxidizer (RTO) is required to be fitted with a combustion chamber continuous temperature-monitoring device. The firing temperature shall not fall below 1387 degrees F (three hour block averaging) while coating operations are underway in the North Tower Room. Datalogger information shall be reduced to three-hour block averages.

Note: In recognition that a coating day or a coating run is unlikely to be evenly divisible into three-hour runs (a 10 hour coating day could be 3 three-hour blocks plus one



extra "orphaned" hour) a compensatory adjustment is agreed to by NYSDEC; a less than three-hour block average will suffice on the start and/or the finish of a given coating run or day. It is noted that this agreement will have implications in either a low temperature event or a bypass valve diversion event; a zero-DRE emission factor could persist for less than three hours.

Further, capture is assumed to be 100% only via adherence to EPA Reference Method 204. Modifications to the permanent total enclosure (PTE) of the North Tower Room could potentially alter compliance with RM204. Varflex shall maintain the requirements of EPA Reference Method 204.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1387 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 38: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 228-1.5 (h)

Item 38.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Every owner or operator of a facility which is not subject to the VOC control requirements set forth in section 228.3 because its annual potential to emit VOCs is below the thresholds set forth in section 228.1 must maintain records in a format acceptable to the Department that verify the facility's annual potential to emit VOCs. Upon request, these records must be submitted to the Department.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



Condition 39: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 228-1.5 (j)

Item 39.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 6NYCRR Part 228 must be reported to the Department within 30 days following notice or generation of the information or record.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 40: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 228-1.7

Item 40.1:

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

Emission Unit: 2-COAT2
Process: PS2

Emission Unit: 3-COAT3
Process: PR2

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

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The use of coatings whose VOC-content exceeds 2.9 pounds of VOC per gallon of coating less water and less exempt VOC is prohibited for "Fabric coating lines" unless control is utilized. See Part 228 Table 1.



Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 2.9 pounds per gallon
Reference Test Method: EPA Reference Method 24
Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED PER OCCURRENCE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR 228-1.10

Item 41.1:

The Compliance Certification activity will be performed for the Facility.

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

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within all work areas that are associated with a coating line, the owner or operator of this facility (Varflex) subject to 6NYCRR Part 228 shall:

A) Use closed, non-leaking containers to store or dispose of cloth rags or other absorbent applicators (brushes, rollers, etc) that have been impregnated with VOC solvents that have used for surface preparation, cleanup or coating removal.

B) Store in closed, non-leaking containers, spent or fresh VOC solvents that are to be used for surface preparation, cleanup or coating removal.

C) Not use VOC solvents to cleanup spray equipment unless appropriate equipment is used to collect these cleaning compounds and to minimize VOC evaporation.

D) Not use open containers to store or dispense surface coatings unless production, sampling, maintenance or inspection procedures require operational access. 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.

All associated coating line work areas within the facility shall be inspected daily to verify adherence to items A thru E. One daily inspection per week shall be recorded in a log book; this log shall include the following information:

- 1) The date and time of that inspection
- 2) The areas or items that were observed
- 3) Corrective measures taken, when necessary

Monitoring Frequency: WEEKLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

Condition 42: Operation and Maintenance Requirements
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.6(e)(1)(i), Subpart A

Item 42.1:

At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan required in §63.6(e)(3). Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in §63.6(e)(3)), review of operation and maintenance records, and inspection of the source.

Condition 43: Startup, Shutdown and Malfunction
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.6(e)(3), Subpart A

Item 43.1:



This Condition applies to:

Emission Unit: 1COAT1
Process: PN3

Item 43.2:

The owner or operator of an applicable source shall develop and implement a written startup, shutdown and malfunction (SSM) plan that describes in detail procedures for operating and maintaining the source during periods of SSM and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Consult 40 CFR 63.6(e)(3) (i through viii) for specific requirements regarding SSM plans.

Condition 44: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.4292(b), Subpart OOOO

Item 44.1:

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

Emission Unit: 1-COAT1
Process: PN3
Emission Source: RTO#1

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

Item 44.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

OPERATING LIMITS

If Compliance Option 3 (Process PN3) is selected during a given month, then the CMM regenerative thermal oxidizer (RTO) is required to be fitted with a continuous monitor that reads the combustion chamber temperature. The combustion chamber firing temperature shall not fall below 1387 degrees F (three-hour block average) while coating operations are underway in the North Tower Room. Datalogger information shall be reduced to three-hour block averages. This firing temperature is intended to ensure that the DRE will be at least 98.1% as witnessed in the 10/7/09 performance test.

Note: In recognition that a coating day or a coating run is unlikely to be evenly divisible into three-hour runs (a 10 hour coating day could be 3 three-hour blocks plus one extra "orphaned" hour) a compensatory adjustment is agreed to by NYSDEC; a less than three-hour block average will

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



suffice on the start and/or the finish of a given coating run or day. It is noted that this agreement will have implications in either a low temperature event or a bypass valve diversion event; a zero-DRE emission factor could persist for less than three hours.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1387 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 45: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.4293(a), Subpart OOOO

Item 45.1:

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

Emission Unit: 1-COAT1
Process: PN2

Emission Unit: 2-COAT2
Process: PS2

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

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For any web coating operation for which the emission rate without add-on controls option is used (Compliance Option #2), the facility is not required to meet any work practice standards.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 46: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.4332, Subpart OOOO

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



Item 46.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-COAT1

Process: PN2

Emission Unit: 2-COAT2

Process: PS2

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 46.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

During a given month, if Compliance Option #2 (known as Process PN2 and/or PS2: Emission rate without add-on controls option) has been utilized in either the North or South Tower Rooms, then:

a) Continuous Compliance shall be demonstrated: The OHAP emission rate for each compliance period must be less than 0.12 lb of HAP per lb of solids applied, calculated on a 12-month rolling total basis. Such a calculation must be performed each month.

b) If the OHAP emission rate for any compliance period has exceeded 0.12 lb HAP per lb of solids applied, then this is a deviation from the emissions limitation and shall be reported to both the Administrator and the Department as specified in 63.4310(c)(6) and in 63.4311(a)(6).

c) As part of each Semi-Annual Compliance Report, the facility shall identify any web coating operation for which it used Compliance Option #2 (known as Process PN2 and/or PS2: Emission rate without add-on controls option). If there were no deviations, then Varflex shall submit a statement that, as appropriate, that operation was in compliance with the emission limitation.

d) Facility shall maintain records as specified in 63.4312 and 63.4313.

Process Material: COATING

Parameter Monitored: HAP

Upper Permit Limit: 0.12 kilograms organic HAP per
kilogram solids applied

Monitoring Frequency: MONTHLY

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

Condition 47: Compliance Certification

Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.4364(c), Subpart OOOO

Item 47.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-COAT1

Process: PN3

Emission Source: RTO#1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If an oxidizer is being used to comply with the emission standards, the Varflex must comply with paragraphs (i) through (ii) of this section.

(i) Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months (quarterly) or the chart recorder, data logger, or temperature indicator must be replaced.

(ii) For an oxidizer other than a catalytic oxidizer (to include an RTO), install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 °Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

Monitoring Frequency: QUARTERLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



Condition 48: Compliance Certification

Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.4364(e), Subpart OOOO

Item 48.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-COAT1

Process: PN3

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 48.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

MONITORING PLAN FOR CAPTURE SYSTEM: SELECTED OPERATING
PARAMETER

If Compliance Option 3 (Process PN3) is selected during a given month, then: To ensure the required 100% capture efficiency in the North Tower Room, the provisions of RM204 shall be maintained and one selected parameter shall be monitored. Varflex shall monitor the average facial velocity through any 204-qualified natural draft opening (NDO) of the North Tower Room. This velocity shall not fall below 200 ft/min while the RTO is operating. This measurement shall be made and logged once per month.

Parameter Monitored: AIR FLOW

Lower Permit Limit: 200 feet per minute

Reference Test Method: EPA Reference Method 204

Monitoring Frequency: MONTHLY

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT
DURING STARTUP/SHUTDOWN

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

**** Emission Unit Level ****

Condition 49: Emission Point Definition By Emission Unit

Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR Subpart 201-6



Item 49.1:

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

Emission Unit: 1-COAT1

Emission Point: EP000

Height (ft.): 20 Diameter (in.): 28
NYTMN (km.): 4785.193 NYTME (km.): 462.288 Building: Yard

Item 49.2:

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

Emission Unit: 2-COAT2

Emission Point: EP001

Height (ft.): 33 Diameter (in.): 12
NYTMN (km.): 4785.67 NYTME (km.): 462.294 Building: South Room

Emission Point: EP002

Height (ft.): 32 Diameter (in.): 14
NYTMN (km.): 4785.171 NYTME (km.): 492.292 Building: South Room

Emission Point: EP003

Height (ft.): 31 Diameter (in.): 18
NYTMN (km.): 4785.165 NYTME (km.): 462.296 Building: South Room

Emission Point: EP006

Height (ft.): 33 Diameter (in.): 12
NYTMN (km.): 4785.163 NYTME (km.): 462.298 Building: South Room

Item 49.3:

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

Emission Unit: 3-COAT3

Emission Point: EPOV1

Height (ft.): 29 Diameter (in.): 10
NYTMN (km.): 4785.16 NYTME (km.): 462.279 Building: RodOvenRms

Emission Point: EPOV2

Height (ft.): 29 Diameter (in.): 10
NYTMN (km.): 4785.155 NYTME (km.): 462.275 Building: RodOvenRms

Emission Point: EPOV4

Height (ft.): 17 Diameter (in.): 8
NYTMN (km.): 4785.152 NYTME (km.): 462.278 Building: RodOvenRms

Emission Point: EPOV5

Height (ft.): 34 Diameter (in.): 10
NYTMN (km.): 4785.162 NYTME (km.): 462.276 Building: RodOvenRms



Condition 50: Process Definition By Emission Unit
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 50.1:

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

Emission Unit: 1-COAT1
Process: PN2 Source Classification Code: 4-02-043-30

Process Description:

This process consists of the RTO-controlled web fabric coating and heat-curing operations that are performed in the North Tower Room. The coatings utilized are either compliant or non-compliant with 6 NYCRR 228-1.7 Table 1; but due to utilization of a VOC control device, 228-compliant coatings are not required. 40 CFR 63 Subpart OOOO applies to this process. When this process is referenced, MACT Compliance Option 2 [40 CFR 63.4291(a)(2): Emission Rate WITHOUT add-on Controls] has been selected by Varflex.

Emission Source/Control: RTO#1 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: TOW04 - Process

Emission Source/Control: TOW05 - Process

Emission Source/Control: TOW07 - Process

Emission Source/Control: TOW08 - Process

Emission Source/Control: TOW09 - Process

Emission Source/Control: TOW10 - Process

Emission Source/Control: TOW11 - Process

Emission Source/Control: TOW12 - Process

Item 50.2:

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

Emission Unit: 1-COAT1
Process: PN3 Source Classification Code: 4-02-043-30

Process Description:

This process consists of the RTO-controlled web fabric coating and heat-curing operations that are performed in the North Tower Room. The coatings utilized are either compliant or non-compliant with 6 NYCRR 228-1.7 Table 1; due to the utilization of a VOC control device,



228-compliant coatings are not required. 40 CFR 63 Subpart OOOO applies to this process. When this process is referenced, MACT Compliance Option 3 [40 CFR 63.4291(a)(3): Emission Rate WITH add-on Controls] has been selected by Varflex.

Emission Source/Control: RTO#1 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: TOW04 - Process

Emission Source/Control: TOW05 - Process

Emission Source/Control: TOW07 - Process

Emission Source/Control: TOW08 - Process

Emission Source/Control: TOW09 - Process

Emission Source/Control: TOW10 - Process

Emission Source/Control: TOW11 - Process

Emission Source/Control: TOW12 - Process

Item 50.3:

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

Emission Unit: 2-COAT2

Process: PS2

Source Classification Code: 4-02-043-30

Process Description:

This process consists of the uncontrolled web fabric coating and heat-curing operations that are performed in the South Tower Room. The coatings utilized are all compliant with 6 NYCRR 228-1.7 Table 1 as their VOC content is less than or equal to 2.9 lbs of VOC per gallon of coating less water and less exempt VOC. 40 CFR 63 Subpart OOOO applies to this process. When this process is referenced, MACT Compliance Option 2 [40 CFR 63.4291(a)(2): Emission Rate WITHOUT add-on Controls] has been selected by Varflex.

Emission Source/Control: TOW01 - Process

Emission Source/Control: TOW02 - Process

Emission Source/Control: TOW03 - Process

Emission Source/Control: TOW06 - Process

Item 50.4:

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



Emission Unit: 3-COAT3

Process: PR1

Source Classification Code: 4-02-043-30

Process Description:

This process consists of the coating and heat-curing of non-web fabric sleeves, or "rods". Braided sleeves are coated by hand, these rods are then cured on racks in any of four natural gas-fired walk-in ovens. The rods are for aerospace applications and the coating is manually-applied, therefore Part 228 does not apply to this process per 6 NYCRR 228-1.1(e)(7) and per 6 NYCRR 228-1.1(e)(6). Hence, 228-compliance of coatings is not required. Due to the non-web fabric substrate, 40 CFR 63 Subpart OOOO does not apply to this process. When this process is referenced, all VOC and HAP content of those applied coatings shall be reported as emissions and then added to facility totals.

Emission Source/Control: JIG#1 - Process

Emission Source/Control: JIG#2 - Process

Emission Source/Control: OVEN1 - Process

Emission Source/Control: OVEN2 - Process

Emission Source/Control: OVEN4 - Process

Emission Source/Control: OVEN5 - Process

Item 50.5:

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

Emission Unit: 3-COAT3

Process: PR2

Source Classification Code: 4-02-043-30

Process Description:

This process consists of the coating and heat-curing of non-web fabric sleeves, or "rods". When this process is utilized, the rods are NOT for aerospace applications and Varflex has elected to forego any manually-applied exemption or Part 228 non-applicability; hence, the coatings that are applied will be VOC-compliant with 6 NYCRR 228-1.7 (≤ 2.9 lbs/gal less water & less exempt VOC). The braided sleeves are hand-coated and these rods are cured on racks in any of four natural gas-fired walk-in ovens without the aid of thermal oxidation control. Due to the non-web fabric substrate, 40 CFR 63 Subpart OOOO does NOT apply to this process. When this process is referenced, all VOC and HAP content of those applied coatings shall be reported as emissions and then added to facility totals.

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



Emission Source/Control: JIG#1 - Process

Emission Source/Control: JIG#2 - Process

Emission Source/Control: OVEN1 - Process

Emission Source/Control: OVEN2 - Process

Emission Source/Control: OVEN4 - Process

Emission Source/Control: OVEN5 - Process

Item 50.6:

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

Emission Unit: 4-COAT4

Process: DIS

Source Classification Code: 4-02-999-99

Process Description:

This process consists of a solvent (xylene) recovery distillation unit. Tower clean-up liquid wastes and Mix Room mixing equipment clean-up liquid wastes are processed in this still to separate reusable xylene from unwanted still bottoms. This process may exhaust fugitives into the room airspace and therefore this process has no emission point. When this process is referenced, the calculated (mass balance) VOC and HAP still emissions shall be added to the facility total.

Emission Source/Control: STILL - Process

Condition 51: Compliance Certification

Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.4293(b), Subpart OOOO

Item 51.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-COAT1

Process: PN3

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must develop and implement a work practice plan to minimize organic HAP emissions from the storage,



mixing, and conveying of regulated materials used in, and waste materials generated by, the coating/printing or dyeing/finishing operations for which the facility uses this option; or the facility must meet an alternative standard as provided in §63.4293(c).

The work practice plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

- 1) All organic-HAP containing regulated materials and waste materials must be stored in closed containers.
- 2) Spills of organic-HAP-containing regulated materials, and waste materials must be minimized.
- 3) Organic-HAP-containing regulated materials and waste materials must be conveyed from one location to another in closed containers or pipes.
- 4) Mixing vessels which contain organic-HAP-containing regulated materials must be closed except when adding to, removing, or mixing the contents.
- 5) Emissions of organic HAP must be minimized during cleaning of web coating/printing or dyeing/finishing storage, mixing, and conveying equipment.

Monitoring Frequency: SINGLE OCCURRENCE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2011.
Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement: 40CFR 63.4342, Subpart OOOO

Item 52.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-COAT1
Process: PN3

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

Item 52.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



Monitoring Description:

The facility must demonstrate continuous compliance with the applicable operating limits required by §63.4292, as specified in table 2 of subpart OOOO.

If an operating parameter is out of the allowed range specified in table 2 of subpart OOOO, this is a deviation from the operating limit that must be reported as specified in §63.4310(c)(6) and 63.4311(a)(7).

If an operating parameter deviates from the operating limit above, then the facility must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation. For the purposes of completing the compliance calculations specified in §63.4341(e)(4) and (f)(4), the facility must treat the regulated materials applied during a deviation on a controlled coating/printing or dyeing/finishing operation as if they were applied on an uncontrolled coating/printing or dyeing/finishing operating for the time period of the deviation, as indicated in equation 1 of §63.4341 for a web coating/printing operation, and in equation 5 of §63.4341 for a dyeing/finishing operation.

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 53: Compliance Certification

Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.4342, Subpart OOOO

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-COAT1

Process: PN3

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 53.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Consistent with §63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction of the emission capture system, add-on control device, or web coating/printing or dyeing/finishing operation that may affect emission capture or control device efficiency



are not violations if the facility demonstrates to the NYSDEC's satisfaction that the facility was operating in accordance with §63.6(e)(1).

The NYSDEC will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations according to the provisions in §63.6(e).

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

Condition 54: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.4364(b), Subpart OOOO

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-COAT1

Process: PN3

Emission Source: RTO#1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must meet the following requirements for each emission capture system that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere:

1) The facility must install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that takes a reading at least once every 15 minutes and provides a record indicating whether the emissions are directed to the add-on control device or diverted from the add-on control device. The time of occurrence and flow control position must be recorded, as well as every time the flow direction is changed. The flow control position indicator must be installed at the entrance to any bypass line that could divert the emissions away from the add-on control device to the atmosphere.

2) If any bypass line is opened, the facility must include a description of why the bypass line was opened and the



length of time it remained open in the semiannual compliance reports required by §63.4311.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 55: Compliance Certification
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable Federal Requirement:40CFR 63.4364(e), Subpart OOOO

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-COAT1
Process: PN3 Emission Source: RTO#1

Item 55.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility is complying with the emission standards in §63.4290 through the use of a capture system and control device, a site-specific monitoring plan containing the information specified in paragraphs (e)(1) and (2) of this section must be developed for these capture systems. The facility must monitor the capture system in accordance with paragraph (e)(3) of this section. The monitoring plan must be made available for inspection by the permitting authority upon request.

(1) The monitoring plan must:

(i) Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and

(ii) Explain why this parameter is appropriate for demonstrating ongoing compliance; and

(iii) Identify the specific monitoring procedures.

(2) The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in §63.4290. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

(3) All capture system monitoring must be conducted in accordance with the plan.



(4) Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.

(5) The capture system monitoring plan must be reviewed and updated at least annually.

Monitoring Frequency: ANNUALLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 56: Contaminant List
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable State Requirement:ECL 19-0301

Item 56.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

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



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

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

Condition 57: Unavoidable noncompliance and violations
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable State Requirement: 6 NYCRR 201-1.4

Item 57.1:

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 58: Air pollution prohibited
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable State Requirement:6 NYCRR 211.2

Item 58.1:

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

Condition 59: Compliance Demonstration
Effective between the dates of 03/11/2011 and 03/10/2016

Applicable State Requirement:6 NYCRR 211.2

Item 59.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0	PARTICULATES
CAS No: 0NY100-00-0	HAP
CAS No: 0NY998-00-0	VOC

Item 59.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

1. Have a complaint phone line available 24 hours a day, 7 days a week; the employment of an answering machine is acceptable.
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.

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00016

Facility DEC ID: 6301300065



4. Fully document the complaint, results of investigation, and action taken.
5. Semi-Annually, report in a format acceptable to the Department. Facility shall report the number of complaints (even if zero) that have been logged throughout the reporting period.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

