

New York State Department of Environmental Conservation
Facility DEC ID: 6301600073



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-3016-00073/00021
Mod 0 Effective Date: 03/04/2002 Expiration Date: No expiration date.
Mod 1 Effective Date: 06/16/2003 Expiration Date: No expiration date.

Permit Issued To: UTICA CONVERTERS INC
2214 WHITESBORO ST
UTICA, NY 13502-3233

Facility: UTICA CONVERTERS
2214 WHITESBORO ST
UTICA, NY 13502

Contact: JOHN F GORMAN
2214 WHITESBORO STREET
UTICA, NY 13502
(315) 733-4626

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: BRIAN D FENLON
DIVISION OF ENVIRONMENTAL PERMITS
STATE OFFICE BLDG, 317 WASHINGTON ST
WATERTOWN, NY 13601-3787

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 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 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 and Modifications

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

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



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 1-1: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3:

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

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transfer of ownership.

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Expired by Mod No: 1

Item 3.1:

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

Item 3.2:

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

Condition 1-2: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 1-2.1:

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

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

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Expired by Mod No: 1

Item 4.1:

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

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



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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 6 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 6 Headquarters
Division of Environmental Permits
State Office Building, 317 Washington Street
Watertown, NY 13601-3787
(315) 785-2245

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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: UTICA CONVERTERS INC
2214 WHITESBORO ST
UTICA, NY 13502-3233

UTICA CONVERTERS

2214 WHITESBORO ST
UTICA, NY 13502

Authorized Activity By Standard Industrial Classification Code:
2296 - TIRE CORD AND FABRIC

Mod 0 Permit Effective Date: 03/04/2002

Permit Expiration Date: No expiration date.



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 15 6NYCRR 201-6.1(a): Facility Permissible Emissions
- *1-1 6NYCRR 201-6.1(a): Compliance Demonstration
- *11 6NYCRR 201-6.1(a): Compliance Demonstration
- *12 6NYCRR 201-6.1(a): Compliance Demonstration
- *13 6NYCRR 201-6.1(a): Compliance Demonstration
- *14 6NYCRR 201-6.1(a): Compliance Demonstration
- *17 6NYCRR 201-6.1(a): Compliance Demonstration
- *18 6NYCRR 201-6.1(a): Compliance Demonstration
- *19 6NYCRR 201-6.1(a): Compliance Demonstration
- *20 6NYCRR 201-6.1(a): Compliance Demonstration
- 1-2 6NYCRR 228.1(a): Applicability and compliance
- 24 6NYCRR 228.1(d)(4): Compliance must be demonstrated upon start up
- 25 6NYCRR 228.1(g): Once in, always in
- 26 6NYCRR 228.3(e)(1): Compliance Demonstration
- 1-3 6NYCRR 228.5(a): Compliance Demonstration
- 1-4 6NYCRR 228.6(a): Prohibition of Sale or Specification
- 28 6NYCRR 228.6(b): Certification
- 29 6NYCRR 228.10: Compliance Demonstration

Emission Unit Level

- 30 6NYCRR 201-6.1(a): Emission Unit Permissible Emissions

EU=1-000FT

- 31 6NYCRR 212.3(b): Compliance Demonstration
- 33 6NYCRR 228.2: Compliance Demonstration
- 34 6NYCRR 228.3(a): Volatile organic compound emission control requirements
- 35 6NYCRR 228.3(d)(1): coating system approval
- 36 6NYCRR 228.3(d)(2): same substrate, same coating line
- 37 6NYCRR 228.3(d)(3): solids as applied basis
- 38 6NYCRR 228.3(d)(4): instantaneous compliance
- 39 6NYCRR 228.3(d)(5): volume measurement
- 40 6NYCRR 228.3(d)(6): collect and record
- 41 6NYCRR 228.3(d)(7): noncompliance reporting
- 42 6NYCRR 228.4: Compliance Demonstration
- 44 6NYCRR 228.5(b): method 24 40 CFR 60
- 45 6NYCRR 228.5(c): Alternative Analytical Methods
- 46 6NYCRR 228.5(d): samples
- 47 6NYCRR 228.5(e)(1): VOC/solvent recovery
- 48 6NYCRR 228.7: Compliance Demonstration

EU=1-TREAT

- 1-20 6NYCRR 212.4(c): Compliance Demonstration



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- 1-5 6NYCRR 228.2: Compliance Demonstration
- 1-6 6NYCRR 228.3(a): Volatile organic compound emission control requirements
- 1-7 6NYCRR 228.3(d)(1): coating system approval
- 1-8 6NYCRR 228.3(d)(2): same substrate, same coating line
- 1-9 6NYCRR 228.3(d)(3): solids as applied basis
- 1-10 6NYCRR 228.3(d)(4): instantaneous compliance
- 1-11 6NYCRR 228.3(d)(5): volume measurement
- 1-12 6NYCRR 228.3(d)(6): collect and record
- 1-13 6NYCRR 228.3(d)(7): noncompliance reporting
- 1-14 6NYCRR 228.4: Compliance Demonstration
- 1-15 6NYCRR 228.5(b): method 24 40 CFR 60
- 1-16 6NYCRR 228.5(c): Alternative Analytical Methods
- 1-17 6NYCRR 228.5(d): samples
- 1-18 6NYCRR 228.5(e)(1): VOC/solvent recovery
- 1-19 6NYCRR 228.7: Compliance Demonstration

EU=2-KDOFT

- 49 6NYCRR 212.4(c): Compliance Demonstration
- 51 6NYCRR 228.2: Compliance Demonstration
- 52 6NYCRR 228.3(a): Volatile organic compound emission control requirements
- 53 6NYCRR 228.3(d)(1): coating system approval
- 54 6NYCRR 228.3(d)(2): same substrate, same coating line
- 55 6NYCRR 228.3(d)(3): solids as applied basis
- 56 6NYCRR 228.3(d)(4): instantaneous compliance
- 57 6NYCRR 228.3(d)(5): volume measurement
- 58 6NYCRR 228.3(d)(6): collect and record
- 59 6NYCRR 228.3(d)(7): noncompliance reporting
- 60 6NYCRR 228.4: Compliance Demonstration
- 62 6NYCRR 228.5(b): method 24 40 CFR 60
- 63 6NYCRR 228.5(c): Alternative Analytical Methods
- 64 6NYCRR 228.5(d): samples
- 65 6NYCRR 228.5(e)(1): VOC/solvent recovery
- 66 6NYCRR 228.7: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 1-21 ECL 19-0301: Contaminant List
- 67 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 70 6NYCRR 201-5: Emission Unit Definition
- 72 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 73 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 74 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.

Mod 1 Permit Effective Date: 06/16/2003

Permit Expiration Date: No expiration date.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

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

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

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

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

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

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

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

Item E: Emergency Defense - 6NYCRR Part 201-1.5

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event



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occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

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

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific



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

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

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

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Item L: Open Fires - 6 NYCRR Part 215

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

Item M: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not

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limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item N:

Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS

The following conditions are federally enforceable.

Condition 15: Facility Permissible Emissions

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 15.1:

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: 0N(From Mod 1)
Name: HAP

PTE: 49,800 pounds per year

Condition 1-1: Compliance Demonstration

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 1-1.1:

The Compliance Demonstration activity will be performed for the Facility.



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Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sum of the emissions of Hazardous Air Pollutants (HAP's) from the emission units specified in this permit shall not exceed the Potential To Emit of 49800 pounds during any consecutive 12 month period. This is to maintain emission levels below major source threshold levels, and to CAP out of the 40 CFR Part 63 Subpart XXXX. Verification of monthly HAP's will be determined by calculations using emission factors acceptable to the Department. Facility shall provide a report, wth the required calculations and demonstrations of compliance with this limit to the NYSDEC Region 6 office by the reporting deadlines contained below.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2004.

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

Condition 11: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Fe6NYCRR 201-6.1(a)

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000067-56-1 METHYL ALCOHOL

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sum of the emissions of Methyl Alcohol from the



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emission units specified in this permit shall not exceed the Potential To Emit of 19800 pounds during any consecutive 12 month period. This is to maintain emission levels below major source threshold levels, and to CAP out of the 40 CFR Part 63 Subpart XXXX. Verification of monthly Methyl Alcohol emissions will be determined by calculations using emission factors acceptable to the Department. Facility shall provide a report, with the required calculations and demonstrations of compliance with this limit to the NYSDEC Region 6 office by the reporting deadlines contained below.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Condition 12:

Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000100-42-5 STYRENE

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sum of the emissions of Styrene from the emission units specified in this permit shall not exceed the Potential To Emit of 19800 pounds during any consecutive 12 month period. This is to maintain emission levels below major source threshold levels, and to CAP out of the 40 CFR Part 63 Subpart XXXX. Verification of monthly Styrene emissions will be determined by calculations using emission factors acceptable to the Department. Facility shall provide a report, with the required calculations and demonstrations of compliance with this limit to the NYSDEC Region 6 office by the reporting deadlines contained

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below.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Condition 13: Compliance Demonstration
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000101-68-8 METHYLENE BISPHENYL ISOCYANATE

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The sum of the emissions of Methylene Bisphenyl Isocyanate from the emission units specified in this permit shall not exceed the Potential To Emit of 19800 pounds during any consecutive 12 month period. This is to maintain emission levels below major source threshold levels, and to CAP out of the 40 CFR Part 63 Subpart XXXX.
Verification of monthly Methylene Bisphenyl Isocyanate emissions will be determined by calculations using emission factors acceptable to the Department. Facility shall provide a report, with the required calculations and demonstrations of compliance with this limit to the NYSDEC Region 6 office by the reporting deadlines contained below.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).



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Condition 14: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 007439-92LEAD

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sum of the emissions of Lead from the emission units specified in this permit shall not exceed the Potential To Emit of 19800 pounds during any consecutive 12 month period. This is to maintain emission levels below major source threshold levels, and to CAP out of the 40 CFR Part 63 Subpart XXXX. Verification of monthly Lead emissions will be determined by calculations using emission factors acceptable to the Department. Facility shall provide a report, with the required calculations and demonstrations of compliance with this limit to the NYSDEC Region 6 office by the reporting deadlines contained below.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Condition 17: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000050-00-0 FORMALDEHYDE

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Item 17.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sum of the emissions of Formaldehyde from the emission units specified in this permit shall not exceed the Potential To Emit of 19800 pounds during any consecutive 12 month period. This is to maintain emission levels below major source threshold levels, and to CAP out of the 40 CFR Part 63 Subpart XXXX. Verification of monthly Formaldehyde emissions will be determined by calculations using emission factors acceptable to the Department. Facility shall provide a report, with the required calculations and demonstrations of compliance with this limit to the NYSDEC Region 6 office by the reporting deadlines contained below.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Condition 18: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000110-71-4 ETHYLENE GLYCOL DIMETHYL ETHER

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sum of the emissions of Ethylene Glycol Dimethyl Ether from the emission units specified in this permit shall not exceed the Potential To Emit of 19800 pounds during any consecutive 12 month period. This is to



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maintain emission levels below major source threshold levels, and to CAP out of the 40 CFR Part 63 Subpart XXXX. Verification of monthly Ethylene Glycol Dimethyl Ether emissions will be determined by calculations using emission factors acceptable to the Department. Facility shall provide a report, with the required calculations and demonstrations of compliance with this limit to the NYSDEC Region 6 office by the reporting deadlines contained below.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Condition 19: Compliance Demonstration
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Fe6NYCRR 201-6.1(a)

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The sum of the emissions from the emission units specified in this permit shall not exceed the Potential To Emit of 98000 pounds per year for VOC's To verify this limit, the records of material usage and production rates will be used from the Litzler Treater line, in which the total Kevlar tire production will be limited to 1,000,000 pounds per year, along with using the maximum production of Kevlar tire production from the Kiddie Treater.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.



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The initial report is due 1/30/2003.

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

Condition 20: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No:1,3-BUTADIENE

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sum of the emissions of 1,3-Butadiene from the emission units specified in this permit shall not exceed the Potential To Emit of 19800 pounds during any consecutive 12 month period. This is to maintain emission levels below major source threshold levels, and to CAP out of the 40 CFR Part 63 Subpart XXXX. Verification of monthly 1,3-Butadiene emissions will be determined by calculations using emission factors acceptable to the Department. Facility shall provide a report, with the required calculations and demonstrations of compliance with this limit to the NYSDEC Region 6 office by the reporting deadlines contained below.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Condition 1-2: Applicability and compliance

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.1(a)

Item 1-2.1:

Any owner or operator of a facility involving a coating line described in table 1 of 6NYCRR Part 228.7



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or in table 2 of 6NYCRR Part 228.8 and which meets the current applicability criteria, must include with the application for a permit, the method or methods which will be used to comply with the requirements of 6NYCRR Part 228.

**Condition 24: Compliance must be demonstrated upon start up
Effective between the dates of 03/04/2002 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 228.1(d)(4)

Item 24.1:

Any owner or operator of a facility involving a coating line described in table 1 or table 2 of 6 NYCRR Part 228.8 which is constructed after March 1, 1993 and which meets the applicability criteria established in 6 NYCRR Part 228.1 (d)(3), must demonstrate compliance with 6 NYCRR Part 228 upon start up.

**Condition 25: Once in, always in
Effective between the dates of 03/04/2002 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 228.1(g)

Item 25.1:

Any coating line subject to the provisions of this Part, will remain subject to these provisions even if the facility annual potential to emit VOC later falls below applicability criteria.

**Condition 26: Compliance Demonstration
Effective between the dates of 03/04/2002 and Permit Expiration Date**

Applicable F6NYCRR 228.3(e)(1)

Item 26.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The source owner must continue to investigate compliance strategies and submit reports documenting the evaluation of either reformulation, abatement technology, or process modification. The written report must include the results and specific dates of the testing or evaluation. The name(s) of vendors which can independently verify the testing or engineering evaluation must also be supplied to the commissioners representative.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



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Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 04/02/2003 for the period 03/04/2002 through 03/03/2003

Condition 1-3: Compliance Demonstration

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 1-3.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the departments representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the department. Records must be maintained at the facility for a period of five years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-4: Prohibition of Sale or Specification

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.6(a)

Item 1-4.1:

No person shall sell, specify, or require for use the application of a coating on a part or product at a facility with a coating line described in table 1 or 2 of 6NYCRR Part 228 if such use is prohibited. This prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

- (1) coatings utilized at surface coating lines where control equipment has been installed to meet the allowable VOC content limitations specified in tables 1 and 2 of Part 228.8 and 228.9;
- (2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Part 228.3(d); and

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- (3) coatings utilized at surface coating lines that have been granted variances for reasons of technological and economic feasibility as per Part 228.3(e).

ConCertification

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.6(b)

Item 28.1:

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

Condition 29: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 29.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No owner or operator of a facility subject to 6NYCRR Part 228 shall:

- (a) use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup, or coating removal;
- (b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup, or coating removal;
- (c) use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere;
- (d) use open containers to store or dispense surface coatings and/or inks unless production, sampling,

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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; or

(e) use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

The facility shall be inspected daily to determine if there are any open containers present. Open containers, if found, shall be covered.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 30: Emission Unit Permissible Emissions
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 30.1:

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

Emission Unit: 1-000FT

CAS No: 000050000 (From Mod 0)
Name: FORMALDEHYDE
PTE(s): 0.0731 pounds per hour
640.2 pounds per year

CAS No: 000067561 (From Mod 0)
Name: METHYL ALCOHOL
PTE(s): 1.324 pounds per hour
11,600 pounds per year

CAS No: 000(From Mod 0)
Name: STYRENE
PTE(s): 598.1 pounds per year
0.00683 pounds per hour

CAS No: 000101688 (From Mod 0)
Name: METHYLENE BISPHENYL ISOCYANATE

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PTE(s): 0.1022 pounds per hour
895 pounds per year

CAS No: 000(From Mod 0)

Name: 1,3-BUTADIENE

PTE(s): 3 pounds per year
0.00034 pounds per hour

CAS No: 000110714 (From Mod 0)

Name: ETHYLENE GLYCOL DIMETHYL ETHER

PTE(s): 130.1 pounds per year
0.015 pounds per hour

CAS No: 0NY998000 (From Mod 0)

Name: VOC

PTE(s): 91,200 pounds per year
10.41 pounds per hour

Emission2-KD0FT

CAS No: 000050000 (From Mod 0)

Name: FORMALDEHYDE

PTE(s): 23.4 pounds per year
0.00267 pounds per hour

CAS No: 000067561 (From Mod 0)

Name: METHYL ALCOHOL

PTE(s): 0.046 pounds per hour
403 pounds per year

CAS No: 000100425 (From Mod 0)

Name: STYRENE

PTE(s): 0.00282 pounds per hour
24.7 pounds per year

CAS No: 000101688 (From Mod 0)

Name: METHYLENE BISPHENYL ISOCYANATE

PTE(s): 31 pounds per year
0.0035 pounds per hour

CAS No: 000106990 (From Mod 0)

Name: 1,3-BUTADIENE

PTE(s): 0.000014 pounds per hour
0.124 pounds per year

CAS No: 000110714 (From Mod 0)

Name: ETHYLENE GLYCOL DIMETHYL ETHER

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PTE(s): 548 pounds per year
0.063 pounds per hour

CAS No: 0NY998000 (From Mod 0)

Name: VOC

PTE(s): 2,900 pounds per year
0.331 pounds per hour

Emission Unit: 1-TREAT

CAS No: 000050000 (From Mod 1)

Name: FORMALDEHYDE

PTE(s): 47.364 pounds per year
0.0054 pounds per hour

CAS No: 000067561 (From Mod 1)

Name: METHYL ALCOHOL

PTE(s): 896.08 pounds per year
0.1023 pounds per hour

CAS No: 000(From Mod 1)

Name: STYRENE

PTE(s): 68.82 pounds per year
0.0079 pounds per hour

CAS No: 000101688 (From Mod 1)

Name: METHYLENE BISPHENYL ISOCYANATE

PTE(s): 107.18 pounds per year
0.0122 pounds per hour

CAS No: 000106990 (From Mod 1)

Name: 1,3-BUTADIENE

PTE(s): 0.00004 pounds per hour
0.344 pounds per year

CAS No: 0N(From Mod 1)

Name: VOC

PTE(s): 834.8 pounds per year
0.095 pounds per hour

Condition 31: Compliance Demonstration
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.3(b)

Item 31.1:

The Compliance Demonstration activity will be performed for:

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Emission Unit: 1-000FT

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 31.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.150 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2002.

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

Condition 33: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.2

Item 33.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-000FT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 33.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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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, is calculated as follows:

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

Where:

(VOC)_a = VOC content of "as applied" coating, expressed as a mass of VOC in pounds, per gallon of coating, in gallons, minus water and exempt VOC

(Dc)_a = Coating density as applied, in pounds per gallon

(Wv)_a = The weight fraction of total volatiles in the coating, as applied

(Ww)_a = The weight fraction of water in the coating, as applied

(Vw)_a = The volume fraction of water in the coating, as applied

(We)_a = The weight fraction of exempt VOCs in the coating, as applied

(Ve)_a = The volume fraction of exempt VOCs in the coating, as applied

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 34:

**Volatile organic compound emission control requirements
Effective between the dates of 03/04/2002 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 228.3(a)

Item 34.1:

This Condition applies to Emission Unit: 1-000FT

Item 34.2:

No person shall cause or allow the usage of coatings that exceed the allowable pounds of volatile organic compounds per gallon, minus water and excluded VOC at application, as specified in table 1 and table 2



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of Part 228, unless an approved coating system or approved control equipment is utilized or a variance has been granted.

In the absence of an approved coating system, approved control equipment or a variance, surface coating of only those materials specified in conditions of this permit citing Tables 1 and 2 in Sections 228.7 and 228.8 shall be allowed.

Condition 35: coating system approval
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(1)

Item 35.1:

This Condition applies to Emission Unit: 1-000FT

Item 35.2:

Each coating system must be approved by the commissioner's representative prior to the use of the coating system in the manufacture of a product for sale.

Condition 36: same substrate, same coating line
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(2)

Item 36.1:

This Condition applies to Emission Unit: 1-000FT

Item 36.2:

The coating must be applied on the same substrate and at the same coating line. Coating applied at different coating lines cannot be included in any compliance demonstration involving a coating system. In addition, due to the variability in coating application rates, coatings which are applied manually by handheld spray guns cannot be utilized in a coating system compliance demonstration.

Condition 37: solids as applied basis
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(3)

Item 37.1:

This Condition applies to Emission Unit: 1-000FT

Item 37.2:

Compliance must be demonstrated using actual coating usages calculated on a solids as applied basis using the formula in Part 228.2(b)(22). The calculation must be performed for each coating and the aggregate of the results for all coatings applied in each coating system must demonstrate compliance.

Condition 38: instantaneous compliance



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Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(4)

Item 38.1:

This Condition applies to Emission Unit: 1-000FT

Item 38.2:

Compliance must be demonstrated instantaneously. There is no averaging period for individual coatings which are part of a coating system.

Condition 39: volume measurement

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(5)

Item 39.1:

This Condition applies to Emission Unit: 1-000FT

Item 39.2:

The method or instrument which the source owner will accurately measure or calculate the volume of coating applied must be approved by the commissioner's representative.

Condition 40: collect and record

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(6)

Item 40.1:

This Condition applies to Emission Unit: 1-000FT

Item 40.2:

The following information must be collected and recorded:

- (i) the name or identification of each coating which is part of a coating system; and
- (ii) the coating parameters used to determine the VOC content for each coating which is part of a coating system.

Condition 41:

noncompliance reporting

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(7)

Item 41.1:

This Condition applies to Emission Unit: 1-000FT

Item 41.2:

Any record showing noncompliance with Part 228 shall be reported by sending a copy of the record to



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the commissioner's representative within 30 days following the occurrence.

Condition 42: Compliance Demonstration
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.4

Item 42.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-000FT

Item 42.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 44: method 24 40 CFR 60
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(b)

Item 44.1:

This Condition applies to Emission Unit: 1-000FT

Item 44.2:

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings are presented in appendix A, method 24, of 40 CFR 60.

Condition 45: Alternative Analytical Methods



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Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Fed6NYCRR 228.5(c)

Item 45.1:

This Condition applies to Emission Unit: 1-000FT

Item 45.2:

Where the methods referenced in 6 NYCRR Part 228.5(b) are not applicable, alternate analytical methods for surface coating may be acceptable, subject to the approval of the commissioner.

Condition 46: samples

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Fed6NYCRR 228.5(d)

Item 46.1:

This Condition applies to Emission Unit: 1-000FT

Item 46.2:

Representatives of the department shall be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance.

Condition 47: VOC/solvent recovery

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(e)(1)

Item 47.1:

This Condition applies to Emission Unit: 1-000FT

Item 47.2:

When a coating line utilizes control equipment to comply with the provisions of Part 228, test methods acceptable to the department must be used when demonstrating the overall removal efficiency. This demonstration may be performed by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control technique. Method 24 of 40 CFR 60 or an approved alternate analytical method must be used.

Condition 48: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Item 48.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-000FT

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

Item 48.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings applied to fabric may contain no more than 2.9 pounds of volatile organic compounds per gallon of coating, (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: PAINT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-20: Compliance Demonstration

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 1-20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-TREAT

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.



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Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-5: Compliance Demonstration
Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.2

Item 1-5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-TREAT

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

Item 1-5.2:

Compliance Demonstration 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, is calculated as follows:

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

Where:

(VOC)_a = VOC content of "as applied" coating, expressed as a mass of VOC in pounds, per gallon of coating, in gallons, minus water and exempt VOC

(Dc)_a = Coating density as applied, in pounds per gallon

(Wv)_a = The weight fraction of total volatiles in the coating, as applied



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(Ww)_a= The weight fraction of water in the coating, as applied

(Vw)_a= The volume fraction of water in the coating, as applied

(We)_a= The weight fraction of exempt VOCs in the coating, as applied

(Ve)_a= The volume fraction of exempt VOCs in the coating, as applied

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-6: Volatile organic compound emission control requirements
Effective between the dates of 06/16/2003 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 228.3(a)

Item 1-6.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-6.2:

No person shall cause or allow the usage of coatings that exceed the allowable pounds of volatile organic compounds per gallon, minus water and excluded VOC at application, as specified in table 1 and table 2 of Part 228, unless an approved coating system or approved control equipment is utilized or a variance has been granted.

In the absence of an approved coating system, approved control equipment or a variance, surface coating of only those materials specified in conditions of this permit citing Tables 1 and 2 in Sections 228.7 and 228.8 shall be allowed.

**Condition 1-7: coating system approval
Effective between the dates of 06/16/2003 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 228.3(d)(1)

Item 1-7.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-7.2:

Each coating system must be approved by the commissioner's representative prior to the use of the coating system in the manufacture of a product for sale.



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Condition 1-8: same substrate, same coating line
Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(2)

Item 1-8.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-8.2:

The coating must be applied on the same substrate and at the same coating line. Coating applied at different coating lines cannot be included in any compliance demonstration involving a coating system. In addition, due to the variability in coating application rates, coatings which are applied manually by handheld spray guns cannot be utilized in a coating system compliance demonstration.

Condition 1-9: solids as applied basis
Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(3)

Item 1-9.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-9.2:

Compliance must be demonstrated using actual coating usages calculated on a solids as applied basis using the formula in Part 228.2(b)(22). The calculation must be performed for each coating and the aggregate of the results for all coatings applied in each coating system must demonstrate compliance.

Condition 1-10: instantaneous compliance
Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(4)

Item 1-10.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-10.2:

Compliance must be demonstrated instantaneously. There is no averaging period for individual coatings which are part of a coating system.

volume measurement

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(5)

Item 1-11.1:

This Condition applies to Emission Unit: 1-TREAT

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Item 1-11.2:

The method or instrument which the source owner will accurately measure or calculate the volume of coating applied must be approved by the commissioner's representative.

Condition 1-12: collect and record

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(6)

Item 1-12.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-12.2:

The following information must be collected and recorded:
the name or identification of each coating which is part of a coating system; and (i)
coating parameters used to determine the VOC content for each coating which is part (ii) the
system. of a coating

Condition 1-13:

noncompliance reporting

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(7)

Item 1-13.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-13.2:

Any record showing noncompliance with Part 228 shall be reported by sending a copy of the record to the commissioner's representative within 30 days following the occurrence.

Condition 1-14: Compliance Demonstration

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.4

Item 1-14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-TREAT

Item 1-14.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions to the outdoor



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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-15: method 24 40 CFR 60

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Fed6NYCRR 228.5(b)

Item 1-15.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-15.2:

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings are presented in appendix A, method 24, of 40 CFR 60.

Condition 1-16: Alternative Analytical Methods

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(c)

Item 1-16.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-16.2:

Where the methods referenced in 6 NYCRR Part 228.5(b) are not applicable, alternate analytical methods for surface coating may be acceptable, subject to the approval of the commissioner.

Condition 1-17: samples

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(d)

Item 1-17.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-17.2:



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Representatives of the department shall be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance.

Condition 1-18: VOC/solvent recovery

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(e)(1)

Item 1-18.1:

This Condition applies to Emission Unit: 1-TREAT

Item 1-18.2:

When a coating line utilizes control equipment to comply with the provisions of Part 228, test methods acceptable to the department must be used when demonstrating the overall removal efficiency. This demonstration may be performed by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control technique. Method 24 of 40 CFR 60 or an approved alternate analytical method must be used.

Condition 1-19: Compliance Demonstration

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Item 1-19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-TREAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings applied to fabric may contain no more than 2.9 pounds of volatile organic compounds per gallon of coating, (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: PAINT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: SINGLE OCCURRENCE



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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 49: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 49.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-KD0FT

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 49.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than
0.050 grains of particulates per cubic foot of exhaust
gas, expressed at standard conditions on a dry gas basis.
Compliance testing will be conducted at the discretion of
the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 51: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.2

Item 51.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-KD0FT

Regulated Contaminant(s):

CAS No: 0NY998-00-VOC

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Item 51.2:

Compliance Demonstration 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, is calculated as follows:

$$(VOC)_a = (Dc)_a \left\{ \frac{[(Wv)_a - (Ww)_a - (We)_a]}{[1 - [(Vw)_a + (Ve)_a]]} \right\}$$

Where:

(VOC)_a = VOC content of "as applied" coating, expressed as a mass of VOC in pounds, per gallon of coating, in gallons, minus water and exempt VOC

(Dc)_a = Coating density as applied, in pounds per gallon

(Wv)_a = The weight fraction of total volatiles in the coating, as applied

(Ww)_a = The weight fraction of water in the coating, as applied

(Vw)_a = The volume fraction of water in the coating, as applied

(We)_a = The weight fraction of exempt VOCs in the coating, as applied

(Ve)_a = The volume fraction of exempt VOCs in the coating, as applied

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 52: Volatile organic compound emission control requirements
Effective between the dates of 03/04/2002 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 228.3(a)

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Item 52.1:

This Condition applies to Emission Unit: 2-KD0FT

Item 52.2:

No person shall cause or allow the usage of coatings that exceed the allowable pounds of volatile organic compounds per gallon, minus water and excluded VOC at application, as specified in table 1 and table 2 of Part 228, unless an approved coating system or approved control equipment is utilized or a variance has been granted.

In the absence of an approved coating system, approved control equipment or a variance, surface coating of only those materials specified in conditions of this permit citing Tables 1 and 2 in Sections 228.7 and 228.8 shall be allowed.

Condition 53: coating system approval
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(1)

Item 53.1:

This Condition applies to Emission Unit: 2-KD0FT

Item 53.2:

Each coating system must be approved by the commissioner's representative prior to the use of the coating system in the manufacture of a product for sale.

Condition 54: same substrate, same coating line
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(2)

Item 54.1:

This Condition applies to Emission Unit: 2-KD0FT

Item 54.2:

The coating must be applied on the same substrate and at the same coating line. Coating applied at different coating lines cannot be included in any compliance demonstration involving a coating system. In addition, due to the variability in coating application rates, coatings which are applied manually by handheld spray guns cannot be utilized in a coating system compliance demonstration.

Condition 55: solids as applied basis
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(3)

Item 55.1:

This Condition applies to Emission Unit: 2-KD0FT



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Item 55.2:

Compliance must be demonstrated using actual coating usages calculated on a solids as applied basis using the formula in Part 228.2(b)(22). The calculation must be performed for each coating and the aggregate of the results for all coatings applied in each coating system must demonstrate compliance.

Condition 56:

instantaneous compliance

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(4)

Item 56.1:

This Condition applies to Emission Unit: 2-KD0FT

Item 56.2:

Compliance must be demonstrated instantaneously. There is no averaging period for individual coatings which are part of a coating system.

volume measurement

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(5)

Item 57.1:

This Condition applies to Emission Unit: 2-KD0FT

Item 57.2:

The method or instrument which the source owner will accurately measure or calculate the volume of coating applied must be approved by the commissioner's representative.

collect and record

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(6)

Item 58.1:

This Condition applies to Emission Unit: 2-KD0FT

Item 58.2:

The following information must be collected and recorded: (i) the name or identification of each coating which is part of a coating system; and (ii) the coating parameters used to determine the VOC content for each coating which is part of a coating system.

Condition 59:

noncompliance reporting

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3(d)(7)

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Item 59.1:

This Condition applies to Emission Unit: 2-KD0FT

Item 59.2:

Any record showing noncompliance with Part 228 shall be reported by sending a copy of the record to the commissioner's representative within 30 days following the occurrence.

Condition 60: Compliance Demonstration

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal/6NYCRR 228.4

Item 60.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-KD0FT

Item 60.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 62: method 24 40 CFR 60

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal/6NYCRR 228.5(b)

Item 62.1:

This Condition applies to Emission Unit: 2-KD0FT

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Item 62.2:

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings are presented in appendix A, method 24, of 40 CFR 60.

Condition 63: Alternative Analytical Methods
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(c)

Item 63.1:

This Condition applies to Emission Unit: 2-KD0FT

Item 63.2:

Where the methods referenced in 6 NYCRR Part 228.5(b) are not applicable, alternate analytical methods for surface coating may be acceptable, subject to the approval of the commissioner.

Condition 64: samples
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(d)

Item 64.1:

This Condition applies to Emission Unit: 2-KD0FT

Item 64.2:

Representatives of the department shall be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance.

Condition 65: VOC/solvent recovery
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(e)(1)

Item 65.1:

This Condition applies to Emission Unit: 2-KD0FT

Item 65.2:

When a coating line utilizes control equipment to comply with the provisions of Part 228, test methods acceptable to the department must be used when demonstrating the overall removal efficiency. This demonstration may be performed by directly measuring VOC/solvent recovery and VOC/solvent usage rates where VOC/solvent recovery is the only control technique. Method 24 of 40 CFR 60 or an approved alternate analytical method must be used.

Condition 66: Compliance Demonstration
Effective between the dates of 03/04/2002 and Permit Expiration Date

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Applicable Federal Requirement: 6NYCRR 228.7

Item 66.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-KD0FT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 66.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings applied to fabric may contain no more than 2.9 pounds of volatile organic compounds per gallon of coating, (minus water and excluded VOC) as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: PAINT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: Method 24 (40CFR60)

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6NYCRR Part 201-1.10(a)

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

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

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

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



law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 1-21:

Contaminant List

Effective between the dates of 06/16/2003 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 1-21.1:

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

CAS No: 000106-99-0
Name: 1,3-BUTADIENE

CAS No: 000110-71-4
Name: ETHYLENE GLYCOL DIMETHYL ETHER

CAS No: 000050-00-0
Name: FORMALDEHYDE

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

CAS No: 007439-92-1
Name: LEAD

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

CAS No: 000101-68-8
Name: METHYLENE BISPHENYL ISOCYANATE

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

CAS No: 000100-42-5
Name: STYRENE

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



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Condition 67: Unavoidable noncompliance and violations
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 67.1:

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



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provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 70: Emission Unit Definition

Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable State R6NYCRR 201-5

Item 70.1(From Mod 1):

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

Emission Unit: 1-TREAT

Emission Unit Description:

INLINE TREATER INCLUDES A DIP TANK AND INFRARED CURING. FABRIC IS RUN THROUGH THE DIP TANK, THEN THROUGH THE CURING OVEN. EMISSIONS ARE COLLECTED AND EXHAUSTED TO A REGENERATIVE THERMAL OXIDIZER (RTO).

Building(s): PLANT2

Item 70.2(From Mod 0):

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

Emission Unit: 1-000FT

Emission Unit Description:

Fabric Treatment operations. Litzier Treater includes a dip tank, heating and drying operations. Fabric is run through a dip tank then through an extractor to remove excess dip. Excess dip is separated and returned to the dip tank. The fabric continues through a series of drying and heating towers to dry and heat set the fabric.

Building(s): TREAT

Item 70.3(From Mod 0):

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

Emission Unit: 2-KD0FT

Emission Unit Description:

Fabric Treatment operations. Kiddie Treater is a small scale system, similar to Litzler. Kiddie Treater includes a dip tank, extractor, drying and heating operations. Fabric is run through the dip tank, extractor and drying and heating operations. All emission points are vented through one single emission point.

Building(s): WARE

Condition 72: Air pollution prohibited

Effective between the dates of 03/04/2002 and Permit Expiration Date

New York State Department of Environmental Conservation

Permit ID: 6-3016-00073/00021

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Applicable State Requirement: 6NYCRR 211.2

Item 72.1:

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.

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

Condition 73:

**Emission Point Definition By Emission Unit
Effective between the dates of 03/04/2002 and Permit Expiration Date**

Applicable State Requirement: 6NYCRR 201-5

Item 73.1(From Mod 1):

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

Emission Unit: 1-TREAT

Emission P00001

Height (ft.): 48 Diameter (in.): 26
NYTMN (km.): 4772.975 NYTME (km.): 478.572 Building: PLANT2

Item 73.2(From Mod 0):

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

Emission 1-000FT

Emission Point: 00H01

Height (ft.): 125 Diameter (in.): 36
NYTNYTME (km.): 478.5 Building: TREAT

Emission Point: 00H02

Height (ft): 125 Diameter (in.): 36
NYTMN (km.): 4772.2 NYTME (km.): 478.5 Building: TREAT

Emission Point: 00H03

Height (ft.): 125 Diameter (in.): 36
NYTMN (km.): 4772.2 NYTME (km.): 478.5 Building: TREAT

Emission P00H04



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Height (ft.): 125 Diameter (in.): 36
NYTNYTME (km.): 478.5 Building: TREAT

Emission Point: 00H05
Height (ft.)Diameter (in.): 36
NYTMN (km.): 4772.2 NYTME (km.): 478.5 Building: TREAT

Emission Point: 00H06
Height (ft.): 125 Diameter (in.): 36
NYTMN (km.): 4772.2 NYTME (km.): 478.5 Building: TREAT

Emission Po00I07
Height (ft.): 125 Diameter (in.): 12
NYTMN (km.): 4772.2 NYTME (km.): 478.5 Building: TREAT

Emission Point: 00I10
Height (ft.): 28 Diameter (in.): 12
NYTMN (km.): 4772.2 NYTME Building: TREAT

Emission Point: 00J08
Height (ft.): 125 Diameter (in.): 14
NYTNYTME (km.): 478.5 Building: TREAT

Emission Point: 00J09
Height (ft.)Diameter (in.): 14
NYTMN (km.): 4772.2 NYTME (km.): 478.5 Building: TREAT

Item 73.3(From Mod 0):

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

Emission Unit: 2-KDOFT

Emission Point: K0001
Height (ft.): 38 Diameter (in.): 18
NYTMN (km.): 4772.2 NYTME (Building: WARE

Condition 74: Process Definition By Emission Unit
Effective between the dates of 03/04/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 74.1(From Mod 1):

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

Emission Unit: 1-TREAT
Process: ILT
Process Description:

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TIRE CORD FABRIC TREATING AND CURING/DRYING. TIRE CORD FABRIC IS DIPPED INTO A COATING. AN INFRARED OVEN CURES THE MATERIAL BY DRIVING OFF MOISTURE AND VOCS. EMISSIONS ARE CAPTURED BY AN EXHAUST SYSTEM THAT FEEDS A REGENERATIVE THERMAL OXIDIZER (RTO) FOR THE DESTRUCTION OF VOCS.

Emission Source/Control: RT001 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: IT001 - Process
Design Capacity: 960 linear yards per hour

Item 74.2(From Mod 0):

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

Emission Unit: 1-000FT

Process: FTC

Source Classification Code: 4-02-046-50

Process Description:

COOLING ZONE EXHAUST. THE TREATING PROVIDES FOR COOLING OF THE TREATED YARN AFTER TRAVELING THROUGH THE OVEN. A METAL ENCLOSURE IS IN PLACE OVER THE COOLING AREA AND ACTS LIKE A HOOD. THE BOTTOM OF THE ENCLOSURE IS OPEN TO THE AMBIENT AIR WITHIN THE TREATER BUILDING. CURRENT CONFIGURATION DRAWS AIR FROM WITHIN THIS ENCLOSURE INTO THE TREATER OVENS. EMISSION POINTS ARE PRESENT ON OVEN 1 AND OVEN 3 THAT WOULD ALLOW AIR FROM THIS ENCLOSURE TO BE EXHAUSTED TO THE ATMOSPHERE, THESE EMISSION POINT (00J08, 00J09) ARE CURRENTLY CAPPED AND NOT USED. IF UTICA CONVERTERS SHOULD REQUIRE THE EXHAUST OF THIS AIR, THESE EMISSION POINTS

MAY BE USED.

THE EMISSIONS THAT WOULD POTENTIALLY BE RELEASED FROM THESE POINTS ARE INCLUDED IN THE FACILITY EMISSION INVENTORY. USE OF THESE POINTS WOULD NOT INCREASE TOTAL EMISSIONS, RATHER A PERCENTAGE OF THE EMISSIONS WOULD BE EXHAUSTED THROUGH THESE POINTS, AND THE EMISSIONS THROUGH OTHER POINTS DECREASE IN PROPORTION. EMISSIONS ARE ACCOUNTED FOR IN THE EMISSION UNIT EMISSIONS SUMMARY

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Emission Source/Control: CZE01 - Process

Emission Source/Control: CZE03 - Process

Item 74.3(From Mod 0):

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

Emission Unit: 1-000FT

Process: FTD

Source Classification Code: 4-02-043-30

Process Description:

FABRIC TREATMENT DIP COATING PROCESS.
ROLLS OF FABRIC ARE RUN THROUGH A DIP TANK
TO APPLY TO A POLYMERIC COATING. COATING
CONTAINS LESS THAN 2.9 LB/GALLON VOC AND IS
THEREFORE COMPLIANT WITH RESPECT TO 6 NYCRR
PART 228 PROVISIONS.

Emission Source/Control: DIP01 - Process

Item 74.4(From Mod 0):

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

Emission Unit: 1-000FT

Process: FTH

Source Classification Code: 4-02-043-40

Process Description:

FABRIC TREATMENT HEATING. NATURAL
GAS-FIRED BURNERS SUPPLY HEAT TO THE OVENS
TO DRIVE OFF MOISTURE AFTER FABRIC HAS BEEN
THROUGH THE DIP TANKS. EACH OVEN HAS A
HEATING AND STAND-BY OPERATION. THE HEATING
AND STANDBY OPERATIONS EACH HAVE INDIVIDUAL
EMISSION POINTS. OVENS DURING STANDARD
OPERATION ARE IN HEATING MODE. MOISTURE AND
COMBUSTION GASES ARE EXHAUSTED THROUGH THE
"HEAT-SIDE: EMISSION POINT OF EACH OVEN.
DURING STOPPINGS, OVENS SWITCHED TO STANDBY
MODE [PROCESS FTS] TO PREVENT DAMAGE TO
FABRIC.

Emission Source/Control: FT001 - Process

Emission Source/Control: FT002 - Process

Emission Source/Control: FT003 - Process

Item 74.5(From Mod 0):



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

Emission Unit: 1-000FT

Process: FTS

Source Classification Code: 4-02-043-40

Process Description:

FABRIC TREATMENT STANDBY. NATURAL GAS-FIRED BURNERS SUPPLY HEAT TO THE OVENS TO DRIVE OFF MOISTURE AFTER FABRIC HAS BEEN THROUGH THE DIP TANKS. EACH OVEN HAS A HEATING AND STAND-BY MODE TO PREVENT DAMAGE TO FABRIC. IN STANDBY, AMBIENT AIR IS MIXED WITH OVEN AIR TO COOL CIRCULATING AIR CONTACTING THE FABRIC IN ORDER TO PREVENT DAMAGE OF THE FABRIC. THE AIR IS EXHAUSTED THROUGH THE "STANDBY-SIDE" EMISSION POINT OF EACH OVEN.

Emission Source/Control: FT001 - Process

Emission SFT002 - Process

Emission Source/Control: FT003 - Process

Item 74.6(From Mod 0):

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

Emission Unit: 1-000FT

Process: FTX

Source Classification Code: 4-02-043-50

Process Description:

VACUUM EXTRACTION AND LIQUID SEPARATION. TWO VACUUM EXTRACTORS REMOVE EXCESS LIQUID FROM THE FABRIC. EXTRACTED LIQUID PASSES THROUGH A SEPARATOR BOX FROM WHICH THE LIQUID IS RETURNED TO THE DIP TANK. EXHAUST IS VENTED TO THE ATMOSPHERE.

Emission Source/Control: VEX01 - Process

Emission Source/Control: VEX02 - Process

Item 74.7(From Mod 0):

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

Emission Unit: 2-KD0FT

Process: KD1

Source Classification Code: 4-02-043-40

Process Description:

KIDDIE FABRIC TREATMENT HEATING AND DRYING

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OPERATIONS. NATURAL GAS-FIRED BURNERS SUPPLY HEAT TO THE OVENS. OVENS DRIVE OFF MOISTURE AFTER FABRIC HAS BEEN THROUGH THE DIP TANKS. KIDDIE UNIT IS SIMILAR TO LITZLER, BUT ON A SMALLER SCALE. ALL OVENS VENTED TH ROUGH 1 EMISSION POINT. COATING CONTAIN LESS THAN 2.9 LB/GALLON VOC AND IS THEREFORE COMPLIANT WITH RESPECT TO 6 NYCRR PART 228 PROVISIONS.

Emission Source/Control: KDIP1 - Process

Emission Source/Control: KID01 - Process

Emission Source/Control: KID02 - Process

Emission SKID03 - Process