



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-0412-00014/02001  
Mod 0 Effective Date: 07/11/2001 Expiration Date: No expiration date.  
Mod 1 Effective Date: 02/18/2004 Expiration Date: No expiration date.

Permit Issued To: SOLEPOXY INC  
211 FRANKLIN ST  
OLEAN, NY 14760

Contact: JAY FULMER  
LOCTITE CORPORATION- DEXTER ELECTRONIC MATERIALS  
211 FRANKLIN STREET  
OLEAN, NY 14760  
(716) 372-6300

Facility: SOLEPOXY INC  
211 FRANKLIN ST  
OLEAN, NY 14760-1297

Description:  
The Loctite Olean plant manufactures resins for use in the electronic component industry. Typical use of the resin is for protection and insulation of electrical micro-components. The resins are produced in both liquid and powder form. The manufacturing process includes batch mixing, blending, extruding, grinding, and compacting.

On 07/11/01, Loctite was issued a Air State facility permit for the construction of a new batch mixing operation at this facility. The permit was designated Mod 0. This permit (Mod 1) includes all emission sources from the entire plant. This permit limits the emission of any single hazardous air pollutant (HAP) to 9 tons per year (tpy), total HAPs to 22.5 tpy and Volatile Organic Compounds (VOC) to 45 tpy. By the imposition of this federally enforceable emission cap the facility is not subject to Title 5 permitting under 6NYCRR Part 201-6 and also avoids the Reasonable Available Control Technology (RACT) requirements for VOCs under 6NYCRR Part 212.10(a)(2).

Methylethyl Ketone (MEK) is the only HAP which had a Potential to Emit (PTE) above 10 tpy. This permit caps MEK annual emissions to below 9 tpy. However, the facility has requested that other HAPs be capped to below 9 tpy in the event there is a timely need to increase manufacturing capacity. The other capped HAPs are Methanol (methyl alcohol), Methyl Isobutyl Ketone (4-methyl 2-pentanone), Toluene, Formaldehyde, Methyl Ethyl Ketone and 1,1,2 Trichloroethane. In the event there is a need to increase capacity, the change may be able to be handled by a minor permit modification. In any case the facility will be required to track the emission of all HAPs to assure maintaining the total HAP emission cap.

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 9041200014**



This permit requires the firm to track monthly emissions of each HAP and VOC. In order to accomplish this for all batch processes, the firm will use an emission model known as "Emission Master". This computerized model is based on the EPA's ACT-94 and MACT-98 guidance documents. The use of this model is necessary because of the complexity of determining emission factors for the manufacture of numerous products in numerous batch processes. The model determines emission for operations of filling, purging, heating, depressurization, vacuum solids drying and storage tanks. It works by first creating five theoretical products that generate the highest levels of individual HAPs and VOCs. The model then finds the highest emission theoretical product for each process source. These theoretical products are then used to create emission factors for each contaminant at each process source. Monthly emissions from each emission source are determined by taking monthly production data and multiplying it by the unique emission factor developed at each process source for each contaminant. Like contaminants are then added together from all the emission sources to determine the total maximum possible monthly emissions for the whole facility.

For determining emissions from tray spraying operations, all heptane used will be assumed to be emitted. Also assumed is that all antimony compounds within the yield loss are emitted minus what is captured by the dust collector. Yield loss is calculated by tracking total powders production and consists of raw materials and finished goods spillage and raw materials and finished goods captured in the air ventilation system. MIBK emissions for each particular month will be calculated by tracking the number of drums being cleaned and using the emission factor of 2 lbs MIBK per drum.

A computerized spread sheet will be used to calculate monthly emissions and the latest 12 month rolling total will be calculated for each HAP, total HAP's, and total VOCs. These calculations and record keeping are required to be performed by the tenth of each month.

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:           DAVID S DENK  
  DIVISION OF ENVIRONMENTAL PERMITS  
  270 MICHIGAN AVE  
  BUFFALO, NY 14203-2999

Authorized Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

**Item B: Permittee's Contractors to Comply with Permit**

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

**Item C: Permittee Responsible for Obtaining Other Required Permits**

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

**Item D: No Right to Trespass or Interfere with Riparian Rights**

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

- Facility Inspection by the Department
- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- 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 9 HEADQUARTERS
- Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS



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

**Condition 1-2: Facility Inspection by the Department**  
**Applicable State Requirement: ECL 19-0305**

**Item 1-2.1:**

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 1-2.2:**

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 1-2.3:**

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 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 1-1: Relationship of this Permit to Other Department Orders and Determinations**  
**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 1-1.1:**

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



**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 1-3: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6 NYCRR 621.13**

**Item 1-3.1:**

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 1-3.2:**

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

**Item 1-3.3:**

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

**Condition 3: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6 NYCRR 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 1-4: Permit Modifications, Suspensions and Revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.14**

**Item 1-4.1:**

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

- a) materially false or inaccurate statements in the permit application or supporting



- 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: 6 NYCRR 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 1-5: Submission of Applications for Permit Modification or Renewal -REGION 9**

**HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.5 (a)**

**Item 1-5.1:**

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

NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2999  
(716) 851-7165

**Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9**  
**HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.5 (a)**

**Item 5.1:**

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

NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 9041200014**



Buffalo, NY 14203-2999  
(716) 851-7165

**New York State Department of Environmental Conservation**

Permit ID: 9-0412-00014/02001

Facility DEC ID: 9041200014



**Permit Under the Environmental Conservation Law (ECL)**

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

**IDENTIFICATION INFORMATION**

Permit Issued To: SOLEPOXY INC  
211 FRANKLIN ST  
OLEAN, NY 14760

Facility: SOLEPOXY INC  
211 FRANKLIN ST  
OLEAN, NY 14760-1297

Authorized Activity By Standard Industrial Classification Code:  
3087 - CUSTOM COMPOUND PURCHASED RESINS

Mod 0 Permit Effective Date: 07/11/2001  
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 02/18/2004  
date.

Permit Expiration Date: No expiration



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1-1 6 NYCRR 201-6.1 (a): Facility Permissible Emissions
- \*1-2 6 NYCRR 201-6.1 (a): Compliance Demonstration
- \*1-3 6 NYCRR 201-6.1 (a): Compliance Demonstration
- \*1-4 6 NYCRR 201-6.1 (a): Compliance Demonstration
- \*1-5 6 NYCRR 201-6.1 (a): Compliance Demonstration
- \*1-6 6 NYCRR 201-6.1 (a): Compliance Demonstration
- \*1-7 6 NYCRR 201-6.1 (a): Compliance Demonstration
- \*1-8 6 NYCRR 201-6.1 (a): Compliance Demonstration
- \*1-9 6 NYCRR 201-6.1 (a): Compliance Demonstration

**Emission Unit Level**

**EU=U-00001**

- 1-10 6 NYCRR 212.4 (c): Compliance Demonstration
- 1-11 6 NYCRR 212.6 (a): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1-12 ECL 19-0301: Contaminant List
- 1-13 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 24 6 NYCRR Subpart 201-5: Emission Unit Definition
- 26 6 NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

- 27 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 28 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

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

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

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



required to operate such device effectively.

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

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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



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

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

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

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

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

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

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

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

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

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



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

**Item K: Visible Emissions Limited - 6 NYCRR 211.3**

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

**Item L: Open Fires Prohibitions - 6 NYCRR 215.2**

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item M: Permit Exclusion - ECL 19-0305**

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

**Item N: Federally Enforceable Requirements - 40 CFR 70.6 (b)**

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



regulations.

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 1-1: Facility Permissible Emissions**  
**Effective between the dates of 02/18/2004 and Permit Expiration Date**

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

**Item 1-1.1:**

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

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

per year	CAS No: 000050-00-0 (From Mod 1)	PTE: 18,000 pounds
	Name: FORMALDEHYDE	
per year	CAS No: 000067-56-1 (From Mod 1)	PTE: 18,000 pounds
	Name: METHYL ALCOHOL	
per year	CAS No: 000078-93-3 (From Mod 1)	PTE: 18,000 pounds
	Name: METHYL ETHYL KETONE	
per year	CAS No: 000079-00-5 (From Mod 1)	PTE: 18,000 pounds
	Name: ETHANE, 1,1,2-TRICHLORO	
per year	CAS No: 000108-10-1 (From Mod 1)	PTE: 18,000 pounds
	Name: 2-PENTANONE, 4-METHYL	
per year	CAS No: 000108-88-3 (From Mod 1)	PTE: 18,000 pounds
	Name: TOLUENE	
per year	CAS No: 0NY100-00-0 (From Mod 1)	PTE: 45,000 pounds
	Name: HAP	
per year	CAS No: 0NY998-00-0 (From Mod 1)	PTE: 90,000 pounds
	Name: VOC	

**Condition 1-2: Compliance Demonstration**



Effective between the dates of 02/18/2004 and Permit Expiration Date

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

**Item 1-2.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000108-88-3 TOLUENE

**Item 1-2.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility-wide emission of toluene are limited to 18000 lbs per year. These emissions will be calculated on a rolling 12 month total basis. By limiting toluene emissions to 18000 lbs per year (as well as accepting conditions limiting emissions for other HAPs, total HAPs and total VOCs) the facility will not be subject to Title V permitting requirements.

The facility shall also comply with the following conditions:

1) All records shall be based on verifiable data. The Permittee shall maintain purchase orders and/or invoices to confirm the general accuracy of the records. The permittee shall maintain records showing the quantity of all materials used at the facility which contain toluene. These records shall include the toluene content of the materials. The required records shall be kept on-site or at a nearby location that is readily accessible for a period of five years and shall be made available to representatives of the Department upon request. Department representatives must be granted access to this facility, during normal operating hours, for the purpose of determining compliance with this cap.

2.) All the emission rate determination methods described in the emission capping condition for VOCs, contained in this permit, also apply to toluene emissions quantification.

3.) Monthly emissions shall be calculated by the tenth day of the immediate subsequent month and the latest 12 month rolling total shall be calculated for toluene. If the 18000 lbs per year limit is exceeded within any 12 month period it shall be reported to the regional office within



three (3) working days.

4.) The emission of pollutants that exceed the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part 201 and of the Act.

5.) This facility shall maintain all purchase and disposal records on-site or from a nearby location that is readily accessible for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to the facility during normal operating hours, for the purpose of determining compliance with this record keeping requirement.

6.) On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated this emission unit within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: TOLUENE

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/09/2004 for the period 02/18/2004 through 07/10/2004

**Condition 1-3: Compliance Demonstration**  
**Effective between the dates of 02/18/2004 and Permit Expiration Date**

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

**Item 1-3.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

**Item 1-3.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL



DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility-wide total hazardous air pollutants (HAPs) emissions are limited to 45000 lbs per year. These emissions will be calculated on a rolling 12 month total basis. By limiting total HAP emissions to 45000 lbs per year (as well as accepting conditions limiting emissions for other HAPs and total VOCs) the facility will not be subject to Title V permitting requirements.

The facility shall also comply with the following conditions:

- 1) All records shall be based on verifiable data. The Permittee shall maintain purchase orders and/or invoices to confirm the general accuracy of the records. The permittee shall maintain records showing the quantity of all materials used at the facility which contain HAPs. These records shall include the HAP content of the materials. The required records shall be kept on-site or at a nearby location that is readily accessible for a period of five years and shall be made available to representatives of the Department upon request. Department representatives must be granted access to this facility, during normal operating hours, for the purpose of determining compliance with this cap.
- 2.) All the emission rate determination methods described in the emission capping condition for VOCs, contained in this permit, also apply to HAP emissions quantification.
- 3.) Monthly emissions shall be calculated by the tenth day of the immediate subsequent month and the latest 12 month rolling total shall be calculated for total HAPs. If the 45000 lbs per year limit is exceeded within any 12 month period it shall be reported to the regional office within three (3) working days.
- 4.) The emission of pollutants that exceed the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part 201 and of the Act.
- 5.) This facility shall maintain all purchase and disposal records on-site or at a nearby location that is readily accessible for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to the facility during normal operating hours, for the purpose of determining compliance with this record keeping requirement.



6.) On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated this emission unit within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: HAP

Upper Permit Limit: 45000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/09/2004 for the period 02/18/2004 through 07/10/2004

**Condition 1-4: Compliance Demonstration**  
**Effective between the dates of 02/18/2004 and Permit Expiration Date**

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

**Item 1-4.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000067-56-1 METHYL ALCOHOL

**Item 1-4.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility-wide emission of methyl alcohol are limited to 18000 lbs per year. These emissions will be calculated on a rolling 12 month total basis. By limiting methyl alcohol emission to 18000 lbs per year (as well as accepting conditions limiting emissions for other HAPs, total HAPs and total VOCs) the facility will not be subject to Title V permitting requirements.

The facility shall also comply with the following conditions:

1) All records shall be based on verifiable data. The Permittee shall maintain purchase orders and/or invoices to confirm the general accuracy of the records The



permittee shall maintain records showing the quantity of all materials used at the facility which contain methyl alcohol. These records shall include the methyl alcohol content of the materials. The required records shall be kept on-site or at a nearby location that is readily accessible for a period of five years and shall be made available to representatives of the Department upon request. Department representatives must be granted access to this facility, during normal operating hours, for the purpose of determining compliance with this cap.

2.) All the emission rate determination methods described in the emission capping condition for VOCs, contained in this permit, also apply to methyl alcohol emissions quantification.

3.) Monthly emissions shall be calculated by the tenth day of the immediate subsequent month and the latest 12 month rolling total shall be calculated for methyl alcohol. If the 18000 lbs per year limit is exceeded within any 12 month period it shall be reported to the regional office within three (3) working days.

4.) The emission of pollutants that exceed the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part 201 and of the Act.

5.) This facility shall maintain all purchase and disposal records on-site or at a nearby location that is readily accessible for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to the facility during normal operating hours, for the purpose of determining compliance with this record keeping requirement.

6.) On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated this emission unit within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: METHYL ALCOHOL  
Upper Permit Limit: 18000 pounds per year

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Permit ID: 9-0412-00014/02001

Facility DEC ID: 9041200014



Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/09/2004 for the period 02/18/2004 through 07/10/2004

**Condition 1-5: Compliance Demonstration**  
**Effective between the dates of 02/18/2004 and Permit Expiration Date**

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

**Item 1-5.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000079-00-5 ETHANE, 1,1,2-TRICHLORO

**Item 1-5.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility-wide trichloroethane emissions are limited to 18000 lbs per year. These emissions will be calculated on a rolling 12 month total basis. By limiting trichloroethane emissions to 18000 lbs per year (as well as accepting conditions limiting emissions for other HAPs, total HAPs and total VOCs) the facility will not be subject to Title V permitting requirements.

The facility shall also comply with the following conditions:

1) All records shall be based on verifiable data. The Permittee shall maintain purchase orders and/or invoices to confirm the general accuracy of the records. The permittee shall maintain records showing the quantity of all materials used at the facility which contain trichloroethane. These records shall include the trichloroethane content of the materials. The required records shall be kept on-site or at a nearby location that is readily accessible for a period of five years and shall be made available to representatives of the Department upon request. Department representatives must be granted access to this facility, during normal operating hours, for the purpose of determining compliance with this cap.

2.) All the emission rate determination methods described in the emission capping condition for VOCs, contained in this permit, also apply to trichloroethane emissions



quantification.

3.) Monthly emissions shall be calculated by the tenth day of the immediate subsequent month and the latest 12 month rolling total shall be calculated for trichloroethane. If the 18000 lbs per year limit is exceeded within any 12 month period it shall be reported to the regional office within three (3) working days.

4.) The emission of pollutants that exceed the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part 201 and of the Act.

5.) This facility shall maintain all purchase and disposal records on-site or at a nearby location that is readily accessible for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to the facility during normal operating hours, for the purpose of determining compliance with this record keeping requirement.

6.) On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated this emission unit within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: ETHANE, 1,1,2-TRICHLORO

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/09/2004 for the period 02/18/2004 through 07/10/2004

**Condition 1-6: Compliance Demonstration**  
**Effective between the dates of 02/18/2004 and Permit Expiration Date**

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

**Item 1-6.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000108-10-1      2-PENTANONE, 4-METHYL



**Item 1-6.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility-wide emission of 4-methyl 2-pentanone (also known as methyl isobutyl ketone - MIBK) are limited to 18000 lbs per year. These emissions will be calculated on a rolling 12 month total basis. By limiting MIBK to 18000 lbs per year (as well as accepting conditions limiting emissions for other HAPs, total HAPs and total VOCs) the facility will not be subject to Title V permitting requirements.

The facility shall also comply with the following conditions:

- 1) All records shall be based on verifiable data. The Permittee shall maintain purchase orders and/or invoices to confirm the general accuracy of the records. The permittee shall maintain records showing the quantity of all materials used at the facility which contain methyl isobutyl ketone. These records shall include the MIBK content of the materials. The required records shall be kept on-site or at a nearby location that is readily accessible for a period of five years and shall be made available to representatives of the Department upon request. Department representatives must be granted access to this facility, during normal operating hours, for the purpose of determining compliance with this cap.
- 2.) All the emission rate determination methods described in the emission capping condition for VOCs, contained in this permit, also apply to MIBK emissions quantification.
- 3.) Monthly emissions shall be calculated by the tenth day of the immediate subsequent month and the latest 12 month rolling total shall be calculated for MIBK. If the 18000 lbs per year limit is exceeded within any 12 month period it shall be reported to the regional office within six working days.
- 4.) The emission of pollutants that exceed the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part 201 and of the Act.



5.) This facility shall maintain all purchase and disposal records on-site or at a nearby location that is readily accessible for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to the facility during normal operating hours, for the purpose of determining compliance with this record keeping requirement.

6.) On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated this emission unit within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: 2-PENTANONE, 4-METHYL

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/09/2004 for the period 02/18/2004 through 07/10/2004

**Condition 1-7: Compliance Demonstration**  
**Effective between the dates of 02/18/2004 and Permit Expiration Date**

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

**Item 1-7.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000078-93-3 METHYL ETHYL KETONE

**Item 1-7.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility-wide emission of methyl ethyl ketone (MEK) are limited to 18000 lbs per year. These emissions will be calculated on a rolling 12 month total basis. By limiting MEK emission to 18000 lbs per year (as well as accepting conditions limiting emissions for other HAPs, total HAPs



and total VOCs) the facility will not be subject to Title V permitting requirements.

The facility shall also comply with the following conditions:

- 1) All records shall be based on verifiable data. The Permittee shall maintain purchase orders and/or invoices to confirm the general accuracy of the records. The permittee shall maintain records showing the quantity of all materials used at the facility which contain MEK. These records shall include the MEK content of the materials. The required records shall be kept on-site or at a nearby location that is readily accessible for a period of five years and shall be made available to representatives of the Department upon request. Department representatives must be granted access to this facility, during normal operating hours, for the purpose of determining compliance with this cap.
- 2.) All the emission rate determination methods described in the emission capping condition for VOCs, contained in this permit, also apply to MEK emissions quantification.
- 3.) Monthly emissions shall be calculated by the tenth day of the immediate subsequent month and the latest 12 month rolling total shall be calculated for MEK. If the 18000 lbs per year limit is exceeded within any 12 month period it shall be reported to the regional office within three (3) working days.
- 4.) The emission of pollutants that exceed the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part 201 and of the Act.
- 5.) This facility shall maintain all purchase and disposal records on-site or at a nearby location that is readily accessible for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to the facility during normal operating hours, for the purpose of determining compliance with this record keeping requirement.
- 6.) On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated this emission unit within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the



cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: METHYL ETHYL KETONE

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/09/2004 for the period 02/18/2004 through 07/10/2004

**Condition 1-8: Compliance Demonstration**  
**Effective between the dates of 02/18/2004 and Permit Expiration Date**

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

**Item 1-8.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-8.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL

DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The facility-wide total Volatile Organic Compounds (VOCs) emissions are limited to 90000 lbs per year. These emissions shall be calculated on a rolling 12 month total basis. By limiting total VOCs emissions to 90000 lbs per year (as well as accepting conditions limiting emissions of any single HAP and total HAPs) the facility will not be subject to Title V permitting requirements.

The facility shall also comply with the following conditions:

1) All records shall be based on verifiable data. The Permittee shall maintain purchase orders and/or invoices and production records to confirm the general accuracy of the records. The permittee shall maintain records showing the quantity of all materials used at the facility which contain VOCs and HAPs. These records shall include the VOCs and HAP content of the materials. The required records shall be kept on-site or at a nearby location that is readily accessible for a period of five years and



shall be made available to representatives of the Department upon request. Department representatives must be granted access to this facility, during normal operating hours, for the purpose of determining compliance with this cap.

2.) In calculating air emissions from the batch operations ERM, Loctite's consultant for this project, utilized Mitchell Scientific, Inc.'s Emission Master 6.0. Emission Master is a computerized copyrighted model that is based on the Environmental Protection Agency's (EPA) ACT-94 and MACT-98 guidance documents. This model has been used in NYSDEC Regions 7 and 8. The models included in the software are: filling, purging, heating, depressurization, vacuum, solids drying, and storage tanks.

Since Loctite operates approximately 29 batch mixing operations with hundreds of potential mixes, Loctite and ERM, Loctite's consultant for this project, developed five families of vessels based on similar product mixes associated with these vessel types. Once the initial family grouping strategy was in place, Loctite reviewed each product mix associated with the five families of vessels. During this review, Loctite created five theoretical products, each based on the worst case HAP and VOC constituent for all products made within each of the families of vessels. Even though these products are theoretical, this process allowed Loctite to create ultra-conservative emissions estimates without running hundreds of iterations of Emission Master.

Upon completion of the product review and the creation of the theoretical product mixes, emission calculations were performed in Emission Master for every contaminant (HAPs and VOCs) within each theoretical product. These emission calculations were based on inputs from Loctite for actual processing conditions for Loctite products. Emission Master results provided emission factors based on lbs of emissions per lb of product produced.

These per contaminant emission factors were then easily scaled up for the purposes of calculating both actual annual and potential to emit (PTE). In the case of projecting maximum actual annual emissions, the emission factors (per contaminant) were multiplied by the actual throughput in lbs/year (based on Loctite's peak year from the past 5 years) on a per vessel basis (29 in all). For the purposes of creating potential to emit calculations a maximum emitting time concept (consistent with EPA guidance) was used. This concept accounts for product turnaround time with respect to the batch process. Once this maximum emitting time concept was applied and the



maximum potential batches per year were determined for each of the 29 batch operations, the emission factors in lbs of emission/lb of product were applied to the maximum batch throughput on a per vessel basis. The actual annual and PTE estimates are very conservative because they are based on the theoretical, worst-case product.

There are two attached spreadsheets. The first one displays the emission factors for each HAP and VOC contaminant at each process reactor and the resultant yearly PTE. The second spreadsheet uses the same emission factor and calculates actual emissions.

Henkel Loctite will demonstrate compliance with the permit capping conditions by tracking production volumes on a monthly basis. These monthly volumes will then be used with the worst-case emission factors described above to determine a worst-case emission for each piece of equipment. Production tracking will be performed through the facility's enterprise resource planning software system, SAP. SAP allows the company to track production in each piece of equipment. A monthly report will be generated providing the total production for each piece of equipment in pounds. This information will be inserted into a spreadsheet which will use the emission factor to calculate the emission for each HAP and VOC. The total will then be used to demonstrate compliance with the permit conditions.

The exceptions to this method will be emissions not associated with the batch reactors: particulate antimony compounds from our molding and coating powders operations, methyl isobutyl ketone (MIBK) emissions from solvent cleaning of equipment, and VOC emissions from our tray spraying operation in our light emitting diode (LED) material production.

Emissions of antimony compounds will be calculated by utilizing production yield loss data. Yield loss is calculated for total powders production and consists of raw materials and finished goods spillage and raw materials and finished goods captured in the air ventilation system. Yield loss is reported as a percentage of the total raw material used and is tracked monthly. To calculate antimony compound emissions, Henkel Loctite will assume a worst-case that all of the yield loss is in the air ventilation system. The amount of antimony compound used is tracked each month with a certain percentage incorporated into the final product and the amount lost into the air ventilation system estimated by the total yield loss. The dust collector filter efficiency as reported by the manufacturer will then be used to



calculate the monthly antimony compound emissions.

MIBK emissions are associated with solvent cleaning of the batch reactor vessels. The process is to load a 55 gallon drum of MIBK into the reactor, close the reactor, heat and mix the solvent to clean any residual product, and then drain the contaminated solvent back into the 55 gallon drum. Because the vessel is closed during the cleaning process, the only losses are during the brief loading and unloading process. Mass balance cannot be used to estimate losses because the solvent is used multiple times before discarding and gains mass during cleaning from the residual product. The vessels are not on load cells so the amount of residual product picked up during the cleaning process cannot be measured. Therefore, Henkel Loctite performed "mock" cleanings of a clean vessel to estimate the solvent lost during the cleaning process. After several cleanings, the loss was determined to be less than 1.4 pounds per cleaning. Therefore, a conservative estimate was used of 2 pounds of MIBK emissions per drum of cleaning solvent used. To track monthly usage, Henkel Loctite will include the number of drum additions of solvent used for cleaning in the SAP entries for each production batch. SAP will generate a monthly report indicating the total number of drum additions of cleaning solvent used. This number of drum additions of cleaning solvent multiplied by the emission factor of 2 pounds per drum will provide the monthly total for the tracking spreadsheet.

(3.) Lastly, the portion of the VOC emissions associated with tray spraying in LED will be tracked by a simply tracking the amount of solvent used. The process consists of spraying a silicone mold release dissolved in heptane onto trays used to form our LED product. Assuming that all of the heptane used is emitted, Henkel Loctite will track monthly usage of heptane through our SAP system and include this as a VOC on our spreadsheet.

4.) Monthly emissions shall be calculated by the tenth day of the immediate subsequent month and the latest 12 month rolling total shall be calculated for total VOCs. If the 90000 lbs per year limit is exceeded within any 12 month period it shall be reported to the regional office within three (3) working days.

5.) The emission of pollutants that exceed the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part 201 and of the Act.



6.) This facility shall maintain all purchase records, production records and disposal records on-site or at a nearby location that is readily accessible for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to the facility during normal operating hours, for the purpose of determining compliance with this record keeping requirement.

7.) On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated this emission unit within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: VOC

Upper Permit Limit: 90000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/09/2004 for the period 02/18/2004 through 07/10/2004

**Condition 1-9: Compliance Demonstration**  
**Effective between the dates of 02/18/2004 and Permit Expiration Date**

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

**Item 1-9.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

**Item 1-9.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility-wide formaldehyde emissions will be limited to 18000 lbs per year. These emissions will be calculated on a rolling 12 month total basis. By limiting formaldehyde emissions to 18000 lbs per year (as well as accepting conditions limiting emissions for other HAPs, total HAPs and total VOCs) the facility will not be



subject to Title V permitting requirements.

The facility shall also comply with the following conditions:

- 1) All records shall be based on verifiable data. The Permittee shall maintain purchase orders and/or invoices to confirm the general accuracy of the records. The permittee shall maintain records showing the quantity of all materials used at the facility which contain formaldehyde. These records shall include the formaldehyde content of the materials. The required records shall be kept on-site or at a nearby location that is readily accessible for a period of five years and shall be made available to representatives of the Department upon request. Department representatives must be granted access to this facility, during normal operating hours, for the purpose of determining compliance with this cap.
- 2.) All the emission rate determination methods described in the emission capping condition for VOCs, contained in this permit, also apply to formaldehyde emissions quantification.
- 3.) Monthly emissions shall be calculated by the tenth day of the immediate subsequent month and the latest 12 month rolling total shall be calculated for formaldehyde. If the 18000 lbs per year limit is exceeded within any 12 month period it shall be reported to the regional office within three (3) working days.
- 4.) The emission of pollutants that exceed the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part 201 and of the Act.
- 5.) This facility shall maintain all purchase and disposal records on-site or at a nearby location that is readily accessible for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to the facility during normal operating hours, for the purpose of determining compliance with this record keeping requirement.
- 6.) On an annual basis, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated this emission unit within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the

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cap for that time period and a comparison to those threshold levels that would require the submission of an application for a Title V facility permit, or compliance with an applicable requirement.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/09/2004 for the period 02/18/2004 through 07/10/2004

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

**Condition 1-10: Compliance Demonstration**  
**Effective between the dates of 02/18/2004 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 1-10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

For each stack, emissions of solid particulate are limited to less than 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry basis. Compliance testing by the facility 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

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 1-11: Compliance Demonstration**  
**Effective between the dates of 02/18/2004 and Permit Expiration Date**



**Applicable Federal Requirement:6 NYCRR 212.6 (a)**

**Item 1-11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

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

**Item 1-11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No persons shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except emissions of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation. The facility will also allow the Department to perform the Method 9 evaluation anywhere on plant property.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

Where 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 1-12: Contaminant List**

**Effective between the dates of 02/18/2004 and Permit Expiration Date**

**Applicable State Requirement:ECL 19-0301**

**Item 1-12.1:**

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

CAS No: 000050-00-0

Name: FORMALDEHYDE

CAS No: 000067-56-1

Name: METHYL ALCOHOL

CAS No: 000078-93-3

Name: METHYL ETHYL KETONE

CAS No: 000079-00-5

Name: ETHANE, 1,1,2-TRICHLORO

CAS No: 000108-10-1

Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-88-3

Name: TOLUENE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY998-00-0

Name: VOC

**Condition 1-13: Unavoidable noncompliance and violations**

**Effective between the dates of 02/18/2004 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 1-13.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

- (a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to



the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 24: Emission Unit Definition**  
**Effective between the dates of 07/11/2001 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 24.1(From Mod 1):**

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

Emission Unit: U-00001

Emission Unit Description:

THIS EMISSION UNIT USES BATCH MIXING OPERATIONS TO PRODUCE ELECTRONIC FORMULATED LIQUIDS. THIS EMISSION UNIT ALSO USES



BLENDING, EXTRUDING, GRINDING AND PACKAGING OPERATIONS TO PRODUCE MOLDING POWDERS AND COATING POWDERS. THIS UNIT CONTAINS (14) PROCESSES IDENTIFIED AS R01-R14 AND (56) EMISSION POINTS IDENTIFIED AS E0001-E0056.

Building(s): 01

**Condition 26: Air pollution prohibited**  
**Effective between the dates of 07/11/2001 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 26.1:**

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 27: Emission Point Definition By Emission Unit**  
**Effective between the dates of 07/11/2001 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 27.1(From Mod 1):**

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

Emission Unit:	U-00001		
Emission Point:	00001		
Height (ft.):	36	Diameter (in.):	14
NYTMN (km.):	4665.8	NYTME (km.):	215.4
		Building:	01
Emission Point:	00002		
Height (ft.):	33	Diameter (in.):	27
NYTMN (km.):	4665.8	NYTME (km.):	215.4
		Building:	01
Emission Point:	E0003		
Height (ft.):	17	Diameter (in.):	2
		Building:	01
Emission Point:	E0004		
Height (ft.):	17	Diameter (in.):	2
		Building:	01
Emission Point:	E0005		

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Height (ft.): 19	Diameter (in.): 2	Building: 01
Emission Point: E0006		
Height (ft.): 17	Diameter (in.): 2	Building: 01
Emission Point: E0012		
Height (ft.): 37	Diameter (in.): 18	
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0013		
Height (ft.): 29	Diameter (in.): 18	
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0014		
Height (ft.): 26	Diameter (in.): 10	
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0015		
Height (ft.): 36	Diameter (in.): 28	
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0016		
Height (ft.): 28	Diameter (in.): 18	
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0017		
Height (ft.): 35	Diameter (in.): 24	
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0018		
Height (ft.): 23	Diameter (in.): 12	
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0019		
Height (ft.): 23	Diameter (in.): 12	
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0020		
Height (ft.): 27	Length (in.): 12	Width (in.): 12
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0021		
Height (ft.): 28	Diameter (in.): 16	
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0022		
Height (ft.): 20	Diameter (in.): 2	
NYTMN (km.): 4665.8	NYTME (km.): 215.4	Building: 01
Emission Point: E0023		

**New York State Department of Environmental Conservation**  
**Permit ID: 9-0412-00014/02001**                      **Facility DEC ID: 9041200014**



Height (ft.): 14 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0024 Height (ft.): 24 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0025 Height (ft.): 24 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0026 Height (ft.): 31 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0027 Height (ft.): 30 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0028 Height (ft.): 31 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0029 Height (ft.): 13 NYTMN (km.): 4665.8	Diameter (in.): 1 NYTME (km.): 215.4	Building: 01
Emission Point: E0030 Height (ft.): 29 NYTMN (km.): 4665.8	Diameter (in.): 1 NYTME (km.): 215.4	Building: 01
Emission Point: E0031 Height (ft.): 29 NYTMN (km.): 4665.8	Diameter (in.): 3 NYTME (km.): 215.4	Building: 01
Emission Point: E0032 Height (ft.): 23 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0033 Height (ft.): 23 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0034 Height (ft.): 23 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0035 Height (ft.): 23 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0036		

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Height (ft.): 19 NYTMN (km.): 4665.8	Diameter (in.): 2 NYTME (km.): 215.4	Building: 01
Emission Point: E0037		
Height (ft.): 19 NYTMN (km.): 4665.8	Diameter (in.): 1 NYTME (km.): 215.4	Building: 01
Emission Point: E0038		
Height (ft.): 17 NYTMN (km.): 4665.8	Diameter (in.): 18 NYTME (km.): 215.4	Building: 01
Emission Point: E0039		
Height (ft.): 18 NYTMN (km.): 4665.8	Diameter (in.): 6 NYTME (km.): 215.4	Building: 01
Emission Point: E0040		
Height (ft.): 20 NYTMN (km.): 4665.8	Diameter (in.): 8 NYTME (km.): 215.4	Building: 01
Emission Point: E0041		
Height (ft.): 19 NYTMN (km.): 4665.8	Diameter (in.): 4 NYTME (km.): 215.4	Building: 01
Emission Point: E0042		
Height (ft.): 19 NYTMN (km.): 4665.8	Diameter (in.): 3 NYTME (km.): 215.4	Building: 01
Emission Point: E0043		
Height (ft.): 21 NYTMN (km.): 4665.8	Diameter (in.): 8 NYTME (km.): 215.4	Building: 01
Emission Point: E0044		
Height (ft.): 19 NYTMN (km.): 4665.8	Diameter (in.): 4 NYTME (km.): 215.4	Building: 01
Emission Point: E0045		
Height (ft.): 37 NYTMN (km.): 4665.8	Length (in.): 24 NYTME (km.): 215.4	Width (in.): 24 Building: 01
Emission Point: E0046		
Height (ft.): 35 NYTMN (km.): 4665.8	Diameter (in.): 18 NYTME (km.): 215.4	Building: 01
Emission Point: E0047		
Height (ft.): 23 NYTMN (km.): 4665.8	Length (in.): 9 NYTME (km.): 215.4	Width (in.): 6 Building: 01
Emission Point: E0048		
Height (ft.): 28 NYTMN (km.): 4665.8	Diameter (in.): 18 NYTME (km.): 215.4	Building: 01
Emission Point: E0049		

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Height (ft.): 17 NYTMN (km.): 4665.8	Diameter (in.): 18 NYTME (km.): 215.4	Building: 01
Emission Point: E0050 Height (ft.): 28 NYTMN (km.): 4665.8	Diameter (in.): 6 NYTME (km.): 215.4	Building: 01
Emission Point: E0051 Height (ft.): 21 NYTMN (km.): 4665.8	Diameter (in.): 4 NYTME (km.): 215.4	Building: 01
Emission Point: E0052 Height (ft.): 27 NYTMN (km.): 4665.8	Length (in.): 12 NYTME (km.): 215.4	Width (in.): 12 Building: 01
Emission Point: E0053 Height (ft.): 19 NYTMN (km.): 4665.8	Length (in.): 10 NYTME (km.): 215.4	Width (in.): 12 Building: 01
Emission Point: E0054 Height (ft.): 21 NYTMN (km.): 4665.8	Diameter (in.): 8 NYTME (km.): 215.4	
Emission Point: E0055 Height (ft.): 21 NYTMN (km.): 4665.8	Diameter (in.): 8 NYTME (km.): 215.4	
Emission Point: E0056 Height (ft.): 15 NYTMN (km.): 4665.8	Diameter (in.): 4 NYTME (km.): 215.4	
Emission Point: E0057 Height (ft.): 21 NYTMN (km.): 4665.8	Diameter (in.): 8 NYTME (km.): 215.4	
Emission Point: E0058 Height (ft.): 21 NYTMN (km.): 4665.8	Diameter (in.): 8 NYTME (km.): 215.4	
Emission Point: E0059 Height (ft.): 21 NYTMN (km.): 4665.8	Diameter (in.): 8 NYTME (km.): 215.4	
Emission Point: E0060 Height (ft.): 21 NYTMN (km.): 4665.8	Diameter (in.): 8 NYTME (km.): 215.4	
Emission Point: E0001 Height (ft.): 24	Diameter (in.): 12	Building: 01
Emission Point: E0002		



Height (ft.): 24	Diameter (in.): 24	Building: 01
Emission Point: E0007 Height (ft.): 18	Diameter (in.): 2	Building: 01
Emission Point: E0008 Height (ft.): 18	Diameter (in.): 2	Building: 01
Emission Point: E0009 Height (ft.): 18	Diameter (in.): 2	Building: 01
Emission Point: E0010 Height (ft.): 18	Diameter (in.): 2	Building: 01
Emission Point: E0011 Height (ft.): 18	Diameter (in.): 2	Building: 01

**Condition 28: Process Definition By Emission Unit**  
**Effective between the dates of 07/11/2001 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 28.1(From Mod 1):**

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

Emission Unit: U-00001  
Process: R01 Source Classification Code: 3-13-065-99  
Process Description:  
This process contains three batch reactors used to produce formulated liquids needed in the manufacture of solid state electronic parts.

Emission Source/Control: C0001 - Process

Emission Source/Control: S0001 - Process

Emission Source/Control: S0002 - Process

Emission Source/Control: S0003 - Process

**Item 28.2(From Mod 1):**

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

Emission Unit: U-00001  
Process: R02 Source Classification Code: 3-13-065-99  
Process Description:



This process contains Meyers mixers used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0001 - Process

Emission Source/Control: S0004 - Process

Emission Source/Control: S0005 - Process

Emission Source/Control: S0006 - Process

**Item 28.3(From Mod 1):**

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

Emission Unit: U-00001

Process: R03

Source Classification Code: 3-13-065-99

Process Description:

An A-Tank and a K-Tank mixer used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0001 - Process

Emission Source/Control: S0007 - Process

Emission Source/Control: S0008 - Process

**Item 28.4(From Mod 1):**

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

Emission Unit: U-00001

Process: R04

Source Classification Code: 3-13-065-99

Process Description:

This process contains several mixers and a roll mill used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0002 - Process

Emission Source/Control: C0003 - Process

Emission Source/Control: S0009 - Process

Emission Source/Control: S0010 - Process

Emission Source/Control: S0011 - Process

Emission Source/Control: S0012 - Process

Emission Source/Control: S0013 - Process



Emission Source/Control: S0014 - Process

Emission Source/Control: S0015 - Process

Emission Source/Control: S0016 - Process

Emission Source/Control: S0017 - Process

Emission Source/Control: S0018 - Process

Emission Source/Control: S0019 - Process

**Item 28.5(From Mod 1):**

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

Emission Unit: U-00001

Process: R05

Source Classification Code: 3-13-065-99

Process Description:

This process contains batch reactors and mixers used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: S0020 - Process

Emission Source/Control: S0021 - Process

Emission Source/Control: S0022 - Process

Emission Source/Control: S0023 - Process

Emission Source/Control: S0024 - Process

Emission Source/Control: S0025 - Process

Emission Source/Control: S0026 - Process

Emission Source/Control: S0027 - Process

Emission Source/Control: S0028 - Process

Emission Source/Control: S0029 - Process

Emission Source/Control: S0030 - Process

Emission Source/Control: S0031 - Process

Emission Source/Control: S0032 - Process

**Item 28.6(From Mod 1):**

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

Emission Unit: U-00001



Process: R06 Source Classification Code: 3-13-065-99

Process Description:

This process contains several mixers and batch reactors used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0004 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S0033 - Process

Emission Source/Control: S0034 - Process

Emission Source/Control: S0035 - Process

Emission Source/Control: S0036 - Process

Emission Source/Control: S0037 - Process

Emission Source/Control: S0038 - Process

Emission Source/Control: S0039 - Process

Emission Source/Control: S0040 - Process

Emission Source/Control: S0041 - Process

Emission Source/Control: S0042 - Process

**Item 28.7(From Mod 1):**

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

Emission Unit: U-00001

Process: R07

Source Classification Code: 3-13-065-99

Process Description:

This process contains a weigh station, a distillation unit and a scale all used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0004 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S0043 - Process

Emission Source/Control: S0044 - Process

Emission Source/Control: S0045 - Process

**Item 28.8(From Mod 1):**

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



Emission Unit: U-00001  
Process: R08 Source Classification Code: 3-13-065-99

Process Description:  
This process contains two batch reactors, a spray booth, a weigh station, a packaging table, a pour hood and a rack hood all used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0004 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S0046 - Process

Emission Source/Control: S0047 - Process

Emission Source/Control: S0048 - Process

Emission Source/Control: S0049 - Process

Emission Source/Control: S0050 - Process

Emission Source/Control: S0051 - Process

Emission Source/Control: S0052 - Process

**Item 28.9(From Mod 1):**

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

Emission Unit: U-00001  
Process: R09 Source Classification Code: 3-13-065-99

Process Description:  
This process contains 15 ovens and two packing hoods all used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: S0053 - Process

Emission Source/Control: S0054 - Process

Emission Source/Control: S0055 - Process

Emission Source/Control: S0056 - Process

Emission Source/Control: S0057 - Process

Emission Source/Control: S0058 - Process

Emission Source/Control: S0059 - Process

Emission Source/Control: S0060 - Process

Emission Source/Control: S0061 - Process



- Emission Source/Control: S0062 - Process
- Emission Source/Control: S0063 - Process
- Emission Source/Control: S0100 - Process
- Emission Source/Control: S0101 - Process
- Emission Source/Control: S0103 - Process
- Emission Source/Control: S0104 - Process
- Emission Source/Control: S0105 - Process
- Emission Source/Control: S0106 - Process

**Item 28.10(From Mod 1):**

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

Emission Unit: U-00001  
Process: R10 Source Classification Code: 3-13-065-99  
Process Description:  
This process contains a flash dryer and a mixer both used to produce formulated liquids needed in the manufacture of electronic solid state parts.

Emission Source/Control: C0005 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: S0064 - Process

Emission Source/Control: S0065 - Process

**Item 28.11(From Mod 1):**

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

Emission Unit: U-00001  
Process: R11 Source Classification Code: 3-13-065-99  
Process Description:  
This process contains nine (9) ribbon blenders and two weigh stations used to produce molding powders and coating powders.

Emission Source/Control: C0006 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: C0007 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: C0008 - Control  
Control Type: FABRIC FILTER



- Emission Source/Control: S0066 - Process
- Emission Source/Control: S0067 - Process
- Emission Source/Control: S0068 - Process
- Emission Source/Control: S0069 - Process
- Emission Source/Control: S0070 - Process
- Emission Source/Control: S0071 - Process
- Emission Source/Control: S0072 - Process
- Emission Source/Control: S0073 - Process
- Emission Source/Control: S0074 - Process
- Emission Source/Control: S0075 - Process
- Emission Source/Control: S0076 - Process
- Emission Source/Control: S0077 - Process

**Item 28.12(From Mod 1):**

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

Emission Unit: U-00001  
Process: R12 Source Classification Code: 3-13-065-99  
Process Description:  
This process contains eight (8) extruders and a central vacuum exhaust system used to produce molding powders and coating powders.

- Emission Source/Control: C0011 - Control  
Control Type: FABRIC FILTER
- Emission Source/Control: S0078 - Process
- Emission Source/Control: S0079 - Process
- Emission Source/Control: S0080 - Process
- Emission Source/Control: S0081 - Process
- Emission Source/Control: S0082 - Process
- Emission Source/Control: S0083 - Process
- Emission Source/Control: S0084 - Process



Emission Source/Control: S0085 - Process

Emission Source/Control: S0104 - Process

**Item 28.13(From Mod 1):**

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

Emission Unit: U-00001

Process: R13

Source Classification Code: 3-13-065-99

Process Description:

This process contains two extruders, a grinder and a killian press all used to produce scale up quantities of molding powders and coating powders.

Emission Source/Control: C0009 - Control

Control Type: FABRIC FILTER

Emission Source/Control: S0086 - Process

Emission Source/Control: S0087 - Process

Emission Source/Control: S0088 - Process

Emission Source/Control: S0089 - Process

**Item 28.14(From Mod 1):**

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

Emission Unit: U-00001

Process: R14

Source Classification Code: 3-13-065-99

Process Description:

This process contains packaging, grinding, and classifying equipment used to produce molding powders and coating powders.

Emission Source/Control: C0004 - Control

Control Type: FABRIC FILTER

Emission Source/Control: C0010 - Control

Control Type: FABRIC FILTER

Emission Source/Control: S0090 - Process

Emission Source/Control: S0091 - Process

Emission Source/Control: S0092 - Process

Emission Source/Control: S0093 - Process

Emission Source/Control: S0094 - Process

Emission Source/Control: S0095 - Process



Emission Source/Control: S0096 - Process

Emission Source/Control: S0097 - Process

Emission Source/Control: S0098 - Process

Emission Source/Control: S0099 - Process

