

New York State Department of Environmental Conservation
Facility DEC ID: 9043600010



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-0436-00010/00025
Mod 0 Effective Date: 07/23/2004 Expiration Date: No expiration date.
Mod 4 Effective Date: 11/12/2004 Expiration Date: No expiration date.

Permit Issued To: SIGNORE INC
55-57 JEFFERSON ST
PO BOX 1448
ELLCOTTVILLE, NY 14731-0144

Contact: MICHAEL A DITONTO
SIGNORE INC
55-57 JEFFERSON ST PO BOX 1448
ELLCOTTVILLE, NY 14731-1448
(716) 699-2361

Facility: SIGNORE INC
55-57 JEFFERSON ST
ELLCOTTVILLE, NY 14731

Contact: FLETCHER E WARD
SIGNORE INC
55-57 JEFFERSON ST PO BOX 1448
ELLCOTTVILLE, NY 14731-1448
(716) 699-2361

Description:

This permit is a department initiated modification of an Air State Facility (ASF) permit and is referred to as MOD 4. Its purpose is to add the applicable Part 228 permit conditions that were not included in the original ASF permit (MOD 1). The Part 228.7 condition specify that Signore shall use coatings with a VOC content no higher than Reasonable Available Control Technology (RACT) allows. This means no coating above 3 lbs. VOC per gallon shall be used. Also the three Part 228.10 conditions specify all the items that must be accomplished by the firm in order to minimize VOC emissions during the handling, storage and disposal of the coatings. These Part 228.10 conditions also require that a report be submitted within 30 days of the issuance of the permit outlining what further study the facility has taken to reduce color purge solvent. All the federally enforceable capping conditions limiting 12 month emissions are unchanged from the original AFS permit. Therefore, a public review period for MOD 4 is not required.

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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: KENNETH C TAFT
 DIVISION OF ENVIRONMENTAL PERMITS
 182 EAST UNION - SUITE 3
 ALLEGANY, NY 14706-1328

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

Permit Modifications, Suspensions and Revocations by the Department

Facility Level

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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

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transfer of ownership.

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

Item 4.1:

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

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

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9 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 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: SIGNORE INC
55-57 JEFFERSON ST
PO BOX 1448
ELLCOTTVILLE, NY 14731-0144

Facility: SIGNORE INC
55-57 JEFFERSON ST
ELLCOTTVILLE, NY 14731

Authorized Activity By Standard Industrial Classification Code:
2522 - METAL OFFICE FURNITURE

Mod 0 Permit Effective Date: 07/23/2004

Permit Expiration Date: No expiration date.



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 212.6(a): Compliance Demonstration
- 4-1 6NYCRR 228.10: Handling, storage and disposal of VOCs

Emission Unit Level

EU=0-UHOOK

- 3 6NYCRR 212.4: Compliance Demonstration
- 4 6NYCRR 212.4: Compliance Demonstration

EU=U-INCIN

- 5 6NYCRR 212: Compliance Demonstration
- 6 6NYCRR 212.4(c): Compliance Demonstration
- 7 6NYCRR 212.4(c): Compliance Demonstration

EU=U-PAINT

- 8 6NYCRR 212.4: Compliance Demonstration
- 4-2 6NYCRR 228.7: Compliance Demonstration
- 4-3 6NYCRR 228.10: Compliance Demonstration
- 4-4 6NYCRR 228.10: Compliance Demonstration
- 4-5 6NYCRR 228.10: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

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- 9 ECL 19-0301: Contaminant List
- 10 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 11 6NYCRR 201-5: Emission Unit Definition
- 12 6NYCRR 201-7: Facility Permissible Emissions
- *13 6NYCRR 201-7: Capping Monitoring Condition
- *14 6NYCRR 201-7: Capping Monitoring Condition
- *15 6NYCRR 201-7: Capping Monitoring Condition
- 16 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 17 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 18 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.

Mod 4 Permit Effective Date: 11/12/2004

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 1: Compliance Demonstration

Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 1.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 4-1: Handling, storage and disposal of VOCs
Effective between the dates of 11/12/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 4-1.1:

Within the work area(s) associated with a coating line, the owner or operator of this facility must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents.
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:
 - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

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

Condition 3: Compliance Demonstration

Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4

Item 3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-UHOOK

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

1.) In instances where determination of permissible emission rate using process weight is not applicable (see Table 5) and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except as provided in Section 201.6 of this Title.

2.) As a surrogate for particulate emissions testing, the hook burnoff oven afterburner chamber shall be operated at 1400 to 1600 degrees F when the primary chamber reaches the design operating temperature of 800 degrees. The heat-up and cool-down cycle time periods shall follow manufacturer specifications. At the beginning of each burn the operator shall check both burners and associated equipment to assure proper operation of the unit. Any problems shall be reported to management and shall be corrected prior to the unit resuming operation.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT

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DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration

Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4

Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-UHOOK

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

1.) In instances where determination of permissible emission rate using process weight is not applicable (see Table 5) and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except as provided in Section 201.6 of this Title.

2.) As a surrogate for particulate emissions testing, the hook burnoff oven afterburner chamber shall be operated at 1400 to 1600 degrees F when the primary chamber reaches the design operating temperature of 800 degrees. The heat-up and cool-down cycle time periods shall follow manufacturer specifications. At the beginning of each burn the operator shall check both burners and associated equipment to assure proper operation of the unit. Any problems shall be reported to management and shall be corrected prior to the unit resuming operation.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -

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SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration
Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A June 4, 2003 inspection of the waste paint sludge incinerator conducted by the Department found the unit to be operating in violation of emission limits. In order to avoid additional enforcement action, the facility elected to discontinue the use of the unit and have the waste incinerated as industrial waste. At the request of the facility, this incinerator is remaining in this permit. However, it shall not be reused until corrective action has been undertaken and the unit has been demonstrated to be in compliance with the 20 percent opacity standard and 0.05 grains per dry standard cubic foot (dscf) exhaust gas particulate emission limit according to the following compliance schedule:

- 1.) A plan of corrective action shall be submitted to the Department for review and approval. After approval, the facility shall undertake all necessary corrective action.
- 2.) After corrective action has been completed, the facility shall retain a firm experienced in stack testing for particulates according to EPA Method 5 and shall submit a stack test protocol for review and approval.

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3.) The stack test be conducted by a firm experienced in stack testing for particulates according to EPA Method 5. The Department shall receive 30 day written advance notice prior to undertaking the stack test.

4.) A stack test report shall be submitted to the Department for review and approval 45 days after completing the stack test. Problems with the report, if any, shall be corrected and the report resubmitted. If corrective action is not possible the unit shall be retested.

7.) If after stack testing the incinerator fails to demonstrate compliance with the 0.05 grains dscf particulate limit and the 20 percent opacity limit it shall be rendered inoperative and its use permanently discontinued.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Tethod 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 6: Compliance Demonstration
Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:



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- 1.) Particulate emissions from this incinerator are limited to 0.05 grains per dry standard cubic foot of exhaust gas.
- 2.) As a surrogate for opacity and particulate monitoring, the incinerator afterburner chamber shall be maintained at a temperature of at least 900 degrees F from the time that the incinerator is charged with wood and non hazardous paint sludge until the batch cycle is completed. The facility shall record the start time and end time of each charge and shall take temperature measurements of the primary chamber and afterburner chamber each hour that the waste is in the incinerator and the doors are closed. As an alternative to hourly monitoring, the facility may install and operate a temperature recording chart which serves the same purpose. Temperature measurement shall be read each hour and recorder in a log. The log or recording chart shall be kept in the vicinity of the incinerator. These records shall be made available to the Department's representative during normal business hours.
- 3.) The facility shall be operated in accordance with the operating procedure submitted to the Department by letter dated June 21, 2002 and attached to this permit.
- 4.) The Department reserves the right to request the facility to conduct stack emission testing upon written notice to the facility.
- 5.) Events which result in a lower temperature than 900 degrees F in the afterburner chamber shall be reported by telephone to the Department at 270 Michigan Ave, Division of Air Resources within 2 hours of the occurrence or as soon as practicable after the event.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Monitoring Frequency: HOURLY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Compliance Demonstration
Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

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Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

- 1.) Particulate emissions from this incinerator are limited to 0.05 grains per dry standard cubic foot of exhaust gas.
- 2.) As a surrogate for opacity and particulate monitoring, the incinerator afterburner chamber shall be maintained at a temperature of at least 900 degrees F from the time that the incinerator is charged with wood and non hazardous paint sludge until the batch cycle is completed. The facility shall record the start time and end time of each charge and shall take temperature measurements of the primary chamber and afterburner chamber each hour that the waste is in the incinerator and the doors are closed. As an alternative to hourly monitoring, the facility may install and operate a temperature recording chart which serves the same purpose. Temperature measurement shall be read each hour and recorder in a log. The log or recording chart shall be kept in the vicinity of the incinerator. These records shall be made available to the Department's representative during normal business hours.
- 3.) The facility shall be operated in accordance with the operating procedure submitted to the Department by letter dated June 21, 2002 and attached to this permit.
- 4.) The Department reserves the right to request the facility to conduct stack emission testing upon written notice to the facility.
- 5.) Events which result in a lower temperature than 900 degrees F in the afterburner chamber shall be reported by



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telephone to the Department at 270 Michigan Ave, Division of Air Resources within 2 hours of the occurrence or as soon as practicable after the event.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 900 degrees Fahrenheit

Monitoring Frequency: HOURLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration
Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

1.) In instances where determination of permissible emission rate using process weight is not applicable (see Table 5) and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except as provided in Section 201.6 of this Title.

2.) Based on equipment design specification each source in this emission unit is presumed to be in compliance with this particulate emission limit. The Department may request the facility undertake emission stack testing for particulates if there is a question as to whether an emission source is meeting the above limit due to other factors e.g. maintenance or wear etc.

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Parameter Monitored: PARTICULATES

Upper Permit Limit: .05 grains per dscf

Monitoring Frequency: HOURLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4-2: Compliance Demonstration

Effective between the dates of 11/12/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Item 4-2.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 4-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

- 1.) The VOC content of all surface coatings used for metal furniture coatings shall not exceed 3.0 pounds per gallon as applied. Surface coatings shall not be diluted with solvent prior to application, unless the facility demonstrates that the VOC content after dilution remains below 3.0 pounds VOC per gallon as applied. The procedure used for dilution and the method for calculation shall be submitted to the Department for review and approval prior to implementation.
- 2.) The facility shall maintain MSDS sheets for all surface coatings used in this emission unit. Those records shall be made available upon request of the Department during normal business hours.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: PAINT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3 pounds per gallon

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



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DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4-3: Compliance Demonstration

Effective between the dates of 11/12/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 4-3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 4-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

MANUAL SPRAYING IN BOOTHS 3B AND 4B. *

1.) Through the use of a quick disconnect, paint shall be drained from paint feed lines at both manual paint spray booths. Paint shall not be directly atomized to the control device to purge the lines.

2.) The facility has installed and shall continue to use receptacles in the two manual top coat paint spray booths to capture exhausted solvent during any color change. The solvent is needed to remove any residual paint from the lines and atomizing equipment.

Within 30 days of issuance of this permit the facility shall submit a progress report to the department at 270 Michigan Avenue, Buffalo 14203 on implementation and results of the above steps. This assessment report must also describe what further study the facility has taken to further reduce color purge solvent use and additional steps that can reasonable be implemented.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



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DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 4-4: Compliance Demonstration

Effective between the dates of 11/12/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 4-4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 4-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

MANUAL SPRAYING IN PRIMER BOOTHS 1, 1A, 2, 2A *

1.) Through the use of a quick disconnect, paint shall be drained from paint feed lines at both manual paint spray booths. Paint shall not be directly atomized to the control device to purge the lines.

2.) The facility has installed and shall continue to use receptacles in the two manual top coat paint spray booths to capture exhausted solvent during any color change. The solvent is needed to remove any residual paint from the lines and atomizing equipment.

Within 30 days of issuance of this permit the facility shall submit a progress report to the department at 270 Michigan Avenue, Buffalo 14203 on implementation and results of the above steps. This assessment report must also describe what further study the facility has taken to further reduce color purge solvent use and additional steps that can reasonable be implemented.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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Condition 4-5: Compliance Demonstration

Effective between the dates of 11/12/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 4-5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAINT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 4-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

TOPCOAT AUTOMATIC PAINT LINE 1B AND 2B *

In order to reduce the waste solvent emissions during color changes the facility has undertaken the following steps:

- 1.) Minimize the number of color changes necessary consistent with production requirements;
- 2.) No charging paint to the automated equipment for small color runs;
- 3.) Reducing diameter and length of paint supply lines;
- 4.) Changing paint lines to Teflon to reduce friction and reduce purge material (waste solvent);
- 5.) Initiating purge earlier, maximizing depositing onto parts and reducing remaining coating in paint lined to be purged;
- 6.) Capturing any remaining coating from the paint lines and reutilizing its as blend for interior parts;
- 7.) Capturing solvent/paint blend which can't otherwise be minimized in the primer booths, gravitationally separating out solvent from that material for

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reuse;

8.) Capturing equipment cleanup solvents for reuse;

9.) Better correlating color changes for rejects with subsequent color runs of the same color.

Within 30 days of issuance of this permit the facility shall submit a progress report to the department at 270 Michigan Avenue, Buffalo 14203 on implementation and results of the above steps. This assessment report must also describe what further study the facility has taken to further reduce color purge solvent use and additional steps that can reasonable be implemented.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: 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

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law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 9: Contaminant List
Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 9.1:

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

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

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

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

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

Condition 10: Unavoidable noncompliance and violations
Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 10.1:

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



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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 11: Emission Unit Definition

Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 11.1(From Mod 4):

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

Emission Unit: U-PAINT

Emission Unit Description:

SURFACE COATING OF METAL OFFICE FURNITURE
WITH PRIMER AND TOPCOAT, AND ASSOCIATED
BAKE (CURING) OVEN.

Building(s): MAIN

Item 11.2(From Mod 0):



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

Emission Unit: 0-UHOOK

Emission Unit Description:

HOOK STRIPPING BATCH OVEN TO REMOVE PAINT
RESIDUE FROM CONVEYOR HOOKS

Building(s): MAIN

Item 11.3(From Mod 0):

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

Emission Unit: U-INCIN

Emission Unit Description:

REFUSE INCINERATOR FOR WOOD PALLETS,
CARDBOARD, OFFICE PAPER, AND NON-HAZARDOUS
PAINT SLUDGE.

Building(s): MAINT.

Condition 12: Facility Permissible Emissions

Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 12.1:

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: 001330-20-7 (From Mod 4) PTE: 18,000 pounds per year
Name: XYLENE, M, O & P MIXT.

CAS No: 0NY100-00-0 (From Mod 4) PTE: 45,000 pounds per year
Name: HAP

CAS No: 0NY998-00-0 (From Mod 4) PTE: 90,000 pounds per year
Name: VOC

Condition 13: Capping Monitoring Condition

Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 13.1:

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

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6NYCRR 201-6

Item 13.2:

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

Item 13.3:

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

Item 13.4:

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

Item 13.5:

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

Item 13.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 13.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1.) Facility-wide emissions of Hazardous air Pollutants (HAP) from all emission sources are limited to 22.5 tons for any 12 month period.

2.) The facility shall calculate HAP facility-wide emissions by the 15th day of each month for the preceding 12 month period. This 12 month period shall be from the 1st day of the 1st month and end on the last day of the last month.

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3.) The HAP 12 month emission rate shall be calculated by summing all HAP in materials purchased during each month and subtracting the HAP present in waste removed for disposal during that same month.

5.) This facility shall maintain all purchase and disposal 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 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.

7.) The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part and of the Act.

8.) Any exceedance of the 22.5 ton limit shall be reported to the department at its 270 Michigan Avenue office within three working days of the occurrence.

Parameter Monitored: HAP

Upper Permit Limit: 22.5 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/21/2005 for the period 07/23/2004 through 07/22/2005

Condition 14: Capping Monitoring Condition
Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7



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Permit ID: 9-0436-00010/00025

Facility DEC ID: 9043600010

Item 14.1:

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

6NYCRR 201-6

Item 14.2:

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

Item 14.3:

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

Item 14.4:

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

Item 14.5:

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

Item 14.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 001330-20-7 XYLENE, M, O & P MIXT.

Item 14.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

1.) Facility-wide emissions of xylene (M, O, P) from all emission sources are limited to 9 tons for any 12 month period.

2.) The facility shall calculate xylene (M, O, P)

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facility-wide emissions by the 15th day of each month for the preceding 12 month period. This 12 month period shall be from the 1st day of the 1st month and end on the last day of the last month.

3.) The xylene (M, O, P) 12 month emission rate shall be calculated by summing all xylene (M, O, P) in materials purchased during each month and subtracting the xylene (M, O, P) present in waste removed for disposal during that same month.

5.) This facility shall maintain all purchase and disposal 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 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.

7.) The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part and of the Act.

8.8.) Any exceedance of the 9 ton limit shall be reported to the department at its 270 Michigan Avenue office within three working days of the occurrence.

Parameter Monitored: XYLENE, M, O & P MIXT.

Upper Permit Limit: 9 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/21/2005 for the period 07/23/2004 through 07/22/2005

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Condition 15: Capping Monitoring Condition

Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7

Item 15.1:

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

6NYCRR 201-6

Item 15.2:

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

Item 15.3:

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

Item 15.4:

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

Item 15.5:

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

Item 15.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 15.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

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Permit ID: 9-0436-00010/00025

Facility DEC ID: 9043600010



Monitoring Description:

- 1.) Facility-wide emissions of volatile organic compounds (VOC) from all emission sources are limited to 45 tons for any 12 month period.
- 2.) The facility shall calculate VOC facility-wide emissions by the 15th day of each month for the preceding 12 month period. This 12 month period shall be from the 1st day of the 1st month and end on the last day of the last month.
- 3.) The VOC 12 month emission rate shall be calculated by summing all VOC in materials purchased during each month and subtracting the VOC present in waste removed for disposal during that same month.
- 5.) This facility shall maintain all purchase and disposal 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 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.
- 7.) The emission of pollutants in exceedance of the applicability thresholds for obtaining a Title V facility permit or other applicable requirements constitutes a violation of this Part and of the Act.
- 8.) Any exceedance of the 45 ton limit shall be reported to the department at its 270 Michigan Avenue office within three working days of the occurrence.

Parameter Monitored: VOC

Upper Permit Limit: 45 tons per year

Monitoring Frequency: MONTHLY



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Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 08/21/2005 for the period 07/23/2004 through 07/22/2005

Condition 16: Air pollution prohibited
Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 16.1:

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 17: Emission Point Definition By Emission Unit
Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 17.1(From Mod 0):

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

Emission Unit: 0-UHOOK

Emission Point: 00014

Height (ft.): 22

Diameter (in.): 10

Building: MAIN

Item 17.2(From Mod 0):

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

Emission Unit: U-INCIN

Emission Point: 00010

Height (ft.): 25

Diameter (in.): 18

NYTMN (km.): 4686.32 NYTME (km.): 197.229 Building: MAINT.

Item 17.3(From Mod 0):

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



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Permit ID: 9-0436-00010/00025

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Emission Unit: U-PAINT

Emission Point: 00001

Height (ft.): 22

Diameter (in.): 33

Building: MAIN

Emission Point: 00002

Height (ft.): 22

Diameter (in.): 33

Building: MAIN

Emission Point: 0001A

Height (ft.): 22

Diameter (in.): 33

Building: MAIN

Emission Point: 0001B

Height (ft.): 35

Diameter (in.): 37

Building: MAIN

Emission Point: 0002A

Height (ft.): 22

Diameter (in.): 33

Building: MAIN

Emission Point: 0002B

Height (ft.): 35

Diameter (in.): 37

Building: MAIN

Emission Point: 0003B

Height (ft.): 34

Diameter (in.): 30

Building: MAIN

Emission Point: 0003C

Height (ft.): 30

Length (in.): 19

Width (in.): 26

Building: MAIN

Emission Point: 0004B

Height (ft.): 32

Diameter (in.): 31

Building: MAIN

Condition 18: Process Definition By Emission Unit
Effective between the dates of 07/23/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 18.1(From Mod 4):

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

Emission Unit: U-PAINT



New York State Department of Environmental Conservation

Permit ID: 9-0436-00010/00025

Facility DEC ID: 9043600010

Process: 001

Source Classification Code: 4-02-020-01

Process Description:

SURFACE COATING OF METAL OFFICE FURNITURE
WITH PRIMER AND TOPCOAT, AND ASSOCIATED
BAKE (CURING) OVEN.

Emission Source/Control: 00001 - Process

Item 18.2(From Mod 0):

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

Emission Unit: 0-UHOOK

Process: 003

Source Classification Code: 4-02-900-13

Process Description:

HOOK STRIPPING BATCH OVEN TO REMOVE PAINT
RESIDUE FROM CONVEYOR HOOKS.

Emission Source/Control: 00014 - Process

Item 18.3(From Mod 0):

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

Emission Unit: U-INCIN

Process: 002

Source Classification Code: 4-02-900-13

Process Description:

REFUSE INCINERATOR FOR WOOD PALLETS,
CARDBOARD, OFFICE PAPER, AND NON-HAZARDOUS
PAINT SLUDGE. NOTE; FACILITY CURRENTLY
OPERATING 7:00 AM TO 3:30 PM. INCINERATOR
CAN RUN CONTINUOUSLY FOR UP TO 40 HOURS.

Emission Source/Control: 00010 - Incinerator

Design Capacity: 500 pounds per hour

Waste Feed Method: MANUAL DIRECT FEED

Waste Type: MUNICIPAL SOLID WASTE AND/OR SOLID
WASTE