



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1402-00421/00049
Effective Date: 05/23/2008 Expiration Date: 05/22/2013

Permit Issued To: HENKEL CORPORATION
1001 TROUT BROOK CROSSING
ROCKY HILL, CT 06067

Contact: KEVIN W JOHNSTON
HENKEL CORP
710 OHIO ST
BUFFALO, NY 14203
(716) 856-4910

Facility: HENKEL CORPORATION
710 OHIO ST
BUFFALO, NY 14203

Contact: JAMES F DRZEWIECKI
HENKEL CORP
710 OHIO ST
BUFFALO, NY 14203
(716) 856-4910

Description:

Henkel Corporation manufactures a broad array of adhesives and specialty coatings for sale to the construction, electronics, automotive building and fabricating industries. The permitted facility consists of 7 emission units as follows:

EU 0-01001: a group of 35 mixing vessels, ranging in size from 550 to 2420 gallons, used in the manufacture of volatile organic compounds (VOCs)/hazardous air pollutants (HAPs) solvent based adhesives and coatings;

EU 0-01331: a group of 5 Cowles type and 2 Post type mixers along with a tub, ranging in capacity from 10 to 110 gallons;

EU 0-01041 & EU 010142: a production process for Dualite® finished product;

EU 0-01043: equipment associated with a patented polymeric microsphere drying process;

EU 0-01901: a group of 12 aboveground storage tanks, ranging in capacity from 4400 to 20000 gallons; and

EU 0-01021: portable tote tank reconditioning and cleaning equipment.

All of the mixers in emission units 0-01001 and 0-01331 are now subject to 40CFR63 Subpart HHHHH, Miscellaneous Coating Manufacturing (MCM) National Emission Standard for Hazardous Air Pollutant (NESHAP), which became effective during the previous permit term for the facility. To comply with this rule, Henkel installed, operates and maintains condensers on the affected mixers and a chilled water cooling system to ensure compliant outlet gas temperatures. The facility is also in compliance with 6NYCRR Part 212 VOC Reasonably Available Control Technology (RACT) since



the control required by the MCM NESHAP is more restrictive.

This permit contains an emissions cap for three mixers, designated as sources M210, M211, and M212, which comprise Process 210. The potential-to-emit VOCs for the project which added these three mixers to the facility under a previously issued permit, is greater than 40 tons per year. This permit continues the VOC emissions cap of 39 tons per year which caps the project below the applicability threshold of 6 NYCRR Part 231-2 - New Source Review in Nonattainment Areas and Ozone Transport Regions.

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: DOUGLAS E BORSCHER
 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
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



DEC GENERAL CONDITIONS

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

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(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

New York State Department of Environmental Conservation

Permit ID: 9-1402-00421/00049

Facility DEC ID: 9140200421



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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1001 TROUT BROOK CROSSING
ROCKY HILL, CT 06067

Facility: HENKEL CORPORATION
710 OHIO ST
BUFFALO, NY 14203

Authorized Activity By Standard Industrial Classification Code:
2851 - PAINTS AND ALLIED PRODUCTS
2891 - ADHESIVES AND SEALANTS
9999 - NONCLASSIFIABLE ESTABLISHMENTS

Permit Effective Date: 05/23/2008

Permit Expiration Date: 05/22/2013



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department
Relationship of this Permit to Other Department Orders and Determinations
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Permit modifications, suspensions or revocations by the Department

Facility Level

Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 24 6NYCRR 201-6.5(c)(3): Compliance Certification
- 25 6NYCRR 201-6.5(f): Compliance Certification
- *26 6NYCRR 201-7.1: Capping Monitoring Condition
- 27 6NYCRR 212.4(c): Compliance Certification
- 28 6NYCRR 212.6(a): Compliance Certification
- 29 6NYCRR 212.10(c)(1): Compliance Certification
- 31 40CFR 63.8005(d)(4), Subpart HHHHH: Performance tests after change in operations
- 32 40CFR 63.8005(g), Subpart HHHHH: Flow Indicators
- 33 40CFR 63.8015, Subpart HHHHH: 8015(a) - 1.a - Leaks at existing sources - referral to bulk terminal rule



34 40CFR 63.8030, Subpart HHHHH: Heat exchanger provisions - referral to HON rule

30 40CFR 63.8075(e), Subpart HHHHH: Compliance Certification

35 40CFR 63.8095, Subpart HHHHH: General Provisions Applicability

Emission Unit Level

36 6NYCRR 201-6: Emission Point Definition By Emission Unit

37 6NYCRR 201-6: Process Definition By Emission Unit

38 6NYCRR 201-7.1: Process Permissible Emissions

EU=0-01001,EP=0108X

39 40CFR 63.8005(a), Subpart HHHHH: Compliance Certification

EU=0-01331

40 40CFR 63.8005(a), Subpart HHHHH: Compliance Certification

EU=0-01901

41 6NYCRR 229.3(e)(2)(iv): Compliance Certification

EU=0-01901,EP=0037X,Proc=977,ES=T077A

42 6NYCRR 229.3(e)(2)(v): Compliance Certification

EU=0-01901,EP=0037X,Proc=980,ES=T080A

43 6NYCRR 229.3(e)(2)(v): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

44 ECL 19-0301: Contaminant List

45 6NYCRR 201-1.4: Unavoidable noncompliance and violations

46 6NYCRR 211.2: Air pollution prohibited

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 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 occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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



- Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**



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

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

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

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the



effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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



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

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

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

Effective between the dates of 05/23/2008 and 05/22/2013

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

Item 4.1:

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

Condition 5: Compliance Certification

Effective between the dates of 05/23/2008 and 05/22/2013

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.



Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

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

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

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

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

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



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Compliance certifications shall contain the following information:

- the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
- and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

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

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BCME is as follows:



NYSDEC
Bureau of Compliance Monitoring
and Enforcement
625 Broadway
Albany, NY 12233-3258

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April
15th each year for emissions of the previous calendar
year.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 202-2.5

Item 8.1:

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

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

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

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 215



Item 9.1:

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

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 201-1.7

Item 11.1:

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

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 05/23/2008 and 05/22/2013

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



Item 13.1:

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

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 05/23/2008 and 05/22/2013

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

Item 14.1:

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

Condition 15: Standard Requirement - Provide Information
Effective between the dates of 05/23/2008 and 05/22/2013

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

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 05/23/2008 and 05/22/2013

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

Item 16.1:

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

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

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



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

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

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 05/23/2008 and 05/22/2013

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

Item 17.1:

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

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

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

Condition 18: Off Permit Changes
Effective between the dates of 05/23/2008 and 05/22/2013

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

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 202-1.1



Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 211.3

Item 20.1:

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.

Condition 21: Accidental release provisions.
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:40CFR 68

Item 21.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:40CFR 82, Subpart F



Item 22.1:

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

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

Condition 23: Emission Unit Definition

Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 201-6

Item 23.1:

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

Emission Unit: 0-01001

Emission Unit Description:

A group of 35 mixing vessels serviced by exhaust points 0003X, 0004X, 0042X, 0045X, 0046X, 0030X and 0108X. The mixers are located in buildings #21, 17 22 and 2B. The mixing vessels are designated as follows: M93, M94, M95, M96, M97, M98, M99, M100, M101, M102, M102A, M103, M104, M104A, M105, M106, M107, M108, M109, M110, M111, M112, M202, M203, M204, M205, M206, M207, M208, M209, M210, M211, M212, M214 and M215. The mixing vessels are, or can be used, for the manufacture of VOC/HAP - solvent based adhesives and coatings. The vessels range in capacity from 550-2420 gallons.

Building(s): 17
21
22
2B

Item 23.2:

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

Emission Unit: 0-01021

Emission Unit Description:

Portable tote tank reconditioning and cleaning equipment located within building 32C. Process involves manual cleaning of 330-360 gallon portable tote tanks upon return from customers. Totes are cleaned with various solvents (primarily acetone) so that they can be reused for product shipment to customers. Emission points #0050X and 0051X service the operation.

Building(s): 32C



Item 23.3:

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

Emission Unit: 0-01041

Emission Unit Description:

A production process for Dualite finished product located in Building 2A. Emission point 44X is associated with the patented process. See attachments for additional description. Confidential process.

Building(s): 2A
2B
32A

Item 23.4:

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

Emission Unit: 0-01042

Emission Unit Description:

A production process for Dualite finished product located in Building 32A. Emission points 48X and 49X are associated with the patented process. See attachments for additional description. Confidential process.

Building(s): 18
2A
32A

Item 23.5:

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

Emission Unit: 0-01043

Emission Unit Description:

Equipment associated with a patented polymeric microsphere drying process. The equipment is located in Building 32A. Emission point 47X services the dust collector. See attachments for additional description. Confidential process.

Building(s): 32A

Item 23.6:

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

Emission Unit: 0-01331

Emission Unit Description:

Emission unit consists of 5 Cowles type mixers, 2 post type mixers and two tubs that range in capacity from 10 to 185 gallons. The equipment is serviced by exhaust point 43X. See attachments for additional description. The internal designation for equipment associated with emission unit 0-01331 are: C-1, C-2, C-3, C-4, C-5, P-1, P-2, and H-1. The equipment is located in Building #22.

Building(s): 22
22C



Item 23.7:

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

Emission Unit: 0-01901

Emission Unit Description:

A group of 12 aboveground storage tanks (10 that are outdoors) that range in capacity from 4400 to 19400 gallons. The tanks are designated as follows: AST01, AST02, AST03, AST04, AST05, AST06, AST07, AST08, AST09, AST10, T077A, & T080A.

Building(s): 1
3
TANK FARM

Condition 24: Compliance Certification
Effective between the dates of 05/23/2008 and 05/22/2013

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

Item 24.1:

The Compliance Certification activity will be performed for the Facility.

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

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

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate



whether or not the Department or EPA has approved the results.

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 25: Compliance Certification
Effective between the dates of 05/23/2008 and 05/22/2013

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

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Plan

Plan Objective:

The objective of this Plan is to maximize operational flexibility by building capability into the Henkel Corporation Title V Permit for the facility to make administrative and/or minor changes following a pre-established protocol as allowed for in 6 NYCRR Part 201-6.5(f).

This plan does not address those types of changes that would invoke Part 201-6.7(d) "Significant Permit Modification." Rather, it addresses changes that qualify as minor modifications pursuant to the criteria specified by 6 NYCRR Part 201-6.7(c)(1).

Protocol for Changes:

Henkel Corporation will have the operational flexibility to change batch recipes as needed and no modification of this permit will be required as long as compliance with the following rules is assured:



1. Henkel must notify the Department at least 30 days in advance of the addition of any new volatile organic compound (VOC) or hazardous air pollutant (HAP) to a facility process.
2. Accompanying the notification must be :
 - Sufficient documentation of any projected actual and potential emissions increases or decreases,
 - A complete description of the changes involved in the affected process, and
 - A material safety data sheet for the new chemical.
3. The addition of new solid materials to any facility process may be done without prior notification to the Department, with the exception of solid materials that are HAP's. These must follow requirements 1 and 2 listed above.
4. In the semi-annual report, Henkel must list all of the modifications during the reporting period that followed the requirements of this section. For each modification, include whether advance notification was required and if it was, the date the notification was submitted to the Department.

The Department reserves the right to require additional information or the submission of a permit modification within the 30 day advance notification period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 26: Capping Monitoring Condition
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 201-7.1

Item 26.1:

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

6NYCRR 231-2

Item 26.2:

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



kept on site for a minimum of five years and will be made available to the Department upon request.

The facility shall submit to the Department an annual emission cap report for the previous calendar year by January 30th of each year. The report must include the monthly VOC emissions and total VOC emissions for each rolling 12-month period throughout the calendar year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC

Upper Permit Limit: 39 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 27: Compliance Certification
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 212.4(c)

Item 27.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-01041

Emission Unit: 0-01042

Emission Unit: 0-01043

Item 27.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to



particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site.

Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Monitoring Frequency: WEEKLY

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 28: Compliance Certification
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 28.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-01041

Emission Unit: 0-01042

Emission Unit: 0-01043



Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person 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 only the emission 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 permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Monitoring Frequency: WEEKLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 29: Compliance Certification

Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 212.10(c)(1)



This Condition applies to:

Emission Unit: 001001

Emission Unit: 001331

Item 32.2:

If flow to a control device could be intermittent, the facility must install, calibrate, and operate a flow indicator at the inlet or outlet of the control device to identify periods of no flow. Periods of no flow may not be used in daily or block averages, and it may not be used in fulfilling a minimum data availability requirement.

Condition 33: 8015(a) - 1.a - Leaks at existing sources - referral to bulk terminal rule

Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:40CFR 63.8015, Subpart HHHHH

Item 33.1:

This Condition applies to:

Emission Unit: 001001

Emission Unit: 001331

Item 33.2:

As required in §63.8015, for equipment that is in organic HAP service, the facility shall comply with the requirements in §§63.424(a)-(d) and 63.428(e), (f), and (h)(4), except as specified in §63.8015(b)

Condition 34: Heat exchanger provisions - referral to HON rule

Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:40CFR 63.8030, Subpart HHHHH

Item 34.1:

This Condition applies to:

Emission Unit: 001001

Emission Unit: 001331

Item 34.2:

For each heat exchange system as defined in §63.101 of subpart F, the facility shall comply with the provisions listed in §63.104 of subpart F, except as provided in §63.8030(b)-(e).

Condition 30: Compliance Certification

Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:40CFR 63.8075(e), Subpart HHHHH



Item 30.1:

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

Emission Unit: 0-01001

Emission Unit: 0-01331

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The compliance report shall contain the following items:

- 1) Company name and address
- 2) Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
- 3) Date of report and beginning and ending dates of the reporting period.
- 4) Applicable records and information for periodic reports as specified in referenced subparts F, SS, TT, UU, and WW of Part 63.
- 5) For each startup, shutdown, and malfunction (SSM) during which excess emissions occur, the compliance report must include the following information:
 - records that the procedures specified in the SSM plan were followed or documentation of actions taken that are not consistent with the SSM plan.
 - a description of each malfunction.
- 6) Information on deviations, as defined in §63.8015, as follows:
 - i- If there are no deviations from any emission limit, operating limit, or work practice standard specified in subpart HHHHH, include a statement that there were no deviations from the emission limits, operating limits, or work practice standards during the reporting period.
 - ii- For each deviation from an emission limit, operating limit, or work practice standard that occurs at an affected source where the facility is not using a



continuous monitoring system (CMS) to comply with the emission limit or work practice standard, the facility must include:

a- The total operating time of each affected source during the reporting period.

b- Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective actions taken.

c- Operating logs for the day(s) during which the deviation occurred, except operating logs are not required for deviations of the work practice standards for equipment leaks.

iii- For each deviation from an emission limit or operating limit occurring at an affected source where the facility is using a CMS to comply with the emission limit, the facility must include the following:

a- The date and time that each CMS was inoperative, except for two zero (low-level) and high-level checks

b- The date, time, and duration that each CEMS was out of control, including the information in §63.8(c)(8)

c- The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period

d- A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period

e- A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes

f- A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total source operating time during that reporting period

g- An identification of each HAP that is known to be in the emission stream or wastewater stream, as applicable

h- A description of the product being produced

i- Identification of the CMS

j- The date of the latest CMS certification of audit

k- The operating day or operating block average values of monitored parameters for each day(s) during which the deviation occurred

7) If the facility uses a CEMS, and there were no periods during which it was out-of-control as specified in §63.8(c)(7), include a statement that there were no periods during which the CEMS was out-of-control during the reporting period.



8) Except as specified below, whenever the facility changes any of the information submitted in either the notification of compliance status report or any previously reported change to the notification of compliance status report, the facility must document the change in the compliance report. The notification must include all of the following information:

- Revisions to any of the information reported in the original notification of compliance status report under §63.8075(d)
- Information required by the notification of compliance status report under §63.8075(d) for changes involving the addition of processes or equipment at the affected source

The facility must submit a report 60 days before the scheduled implementation date of any of the changes identified below:

- Any change to the information contained in either the precompliance report or any previously reported change to the precompliance report.
- A change in the status of a control device from small to large.
- A change in compliance status.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 35: General Provisions Applicability
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:40CFR 63.8095, Subpart HHHHH

Item 35.1:

This Condition applies to:

Emission Unit: 001001

Emission Unit: 001331

Item 35.2:

Table 10 of subpart HHHHH lists which parts of the general provisions listed in §63.1-15 of subpart A apply to the facility



**** Emission Unit Level ****

Condition 36: Emission Point Definition By Emission Unit
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 201-6

Item 36.1:

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

Emission Unit: 0-01001

Emission Point: 0002X

Height (ft.): 28 Diameter (in.): 7
 NYTMN (km.): 4752.32 NYTME (km.): 184.129 Building: 2B

Emission Point: 0003X

Height (ft.): 28 Diameter (in.): 14
 NYTMN (km.): 4752.32 NYTME (km.): 184.129 Building: 17

Emission Point: 0004X

Height (ft.): 28 Diameter (in.): 14
 NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 21

Emission Point: 0030X

Height (ft.): 28 Diameter (in.): 7
 NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 22

Emission Point: 0042X

Height (ft.): 20 Diameter (in.): 7
 NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 17

Emission Point: 0045X

Height (ft.): 44 Diameter (in.): 15
 NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 17

Emission Point: 0046X

Height (ft.): 41 Diameter (in.): 15
 NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 21

Emission Point: 0108X

Height (ft.): 25 Diameter (in.): 2
 NYTMN (km.): 4752.32 NYTME (km.): 184.129 Building: 21

Item 36.2:

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

Emission Unit: 0-01021

Emission Point: 0050X

Height (ft.): 41 Diameter (in.): 11
 NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 32C



Emission Point: 0051X
Height (ft.): 41 Diameter (in.): 15
NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 32C

Item 36.3:

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

Emission Unit: 0-01041

Emission Point: 0044X
Height (ft.): 16 Diameter (in.): 19
NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 2B

Item 36.4:

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

Emission Unit: 0-01042

Emission Point: 0048X
Height (ft.): 48 Diameter (in.): 11
NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 18

Emission Point: 0049X
Height (ft.): 48 Diameter (in.): 13
NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 18

Item 36.5:

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

Emission Unit: 0-01043

Emission Point: 0047X
Height (ft.): 50 Diameter (in.): 6
NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 32A

Item 36.6:

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

Emission Unit: 0-01331

Emission Point: 0043X
Height (ft.): 25 Diameter (in.): 19
NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 22C

Item 36.7:

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

Emission Unit: 0-01901

Emission Point: 000TF
Height (ft.): 26 Diameter (in.): 3
NYTMN (km.): 4752.32 NYTME (km.): 184.129 Building: TANK FARM



Emission Point: 0037X
Height (ft.): 28 Diameter (in.): 15
NYTMN (km.): 4752.22 NYTME (km.): 184.129 Building: 3

Condition 37: Process Definition By Emission Unit
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 201-6

Item 37.1:

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

Emission Unit: 0-01001
Process: 093 Source Classification Code: 3-01-014-01
Process Description:

Mixer #93 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M093C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0093 - Process

Item 37.2:

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

Emission Unit: 0-01001
Process: 094 Source Classification Code: 3-01-014-01
Process Description:

Mixer #94 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M094C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0094 - Process

Item 37.3:

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



Emission Unit: 0-01001

Process: 095

Source Classification Code: 3-01-014-01

Process Description:

Mixer #95 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M095C - Control

Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0095 - Process

Item 37.4:

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

Emission Unit: 0-01001

Process: 096

Source Classification Code: 3-01-014-01

Process Description:

Mixer #96 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M096C - Control

Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0096 - Process

Item 37.5:

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

Emission Unit: 0-01001

Process: 097

Source Classification Code: 3-01-014-01

Process Description:

Mixer #97 is a 700 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See



Emission Unit: 0-01001

Process: 100

Source Classification Code: 3-01-014-01

Process Description:

Mixer #100 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M100C - Control

Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0100 - Process

Item 37.9:

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

Emission Unit: 0-01001

Process: 101

Source Classification Code: 3-01-014-01

Process Description:

Mixer #101 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M101C - Control

Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0101 - Process

Item 37.10:

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

Emission Unit: 0-01001

Process: 102

Source Classification Code: 3-01-014-01

Process Description:

Mixer #102 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for



additional information.

Emission Source/Control: M102C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0102 - Process

Item 37.11:

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

Emission Unit: 0-01001

Process: 103

Source Classification Code: 3-01-014-01

Process Description:

Mixer #103 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M103C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0103 - Process

Item 37.12:

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

Emission Unit: 0-01001

Process: 104

Source Classification Code: 3-01-014-01

Process Description:

Mixer #104 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M104C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0104 - Process

Item 37.13:

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

Emission Unit: 0-01001



Process: 105

Source Classification Code: 3-01-014-01

Process Description:

Mixer #105 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M105C - Control

Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0105 - Process

Item 37.14:

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

Emission Unit: 0-01001

Process: 106

Source Classification Code: 3-01-014-01

Process Description:

Mixer #106 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M106C - Control

Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0106 - Process

Item 37.15:

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

Emission Unit: 0-01001

Process: 107

Source Classification Code: 3-01-014-01

Process Description:

Mixer #107 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.



Emission Source/Control: M107C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0107 - Process

Item 37.16:

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

Emission Unit: 0-01001

Process: 108

Source Classification Code: 3-01-014-01

Process Description:

Mixer #108 is a 650 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M108C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0108 - Process

Item 37.17:

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

Emission Unit: 0-01001

Process: 109

Source Classification Code: 3-01-014-01

Process Description:

Mixer #109 is a 550 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M109C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0109 - Process

Item 37.18:

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

Emission Unit: 0-01001

Process: 110

Source Classification Code: 3-01-014-01



Process Description:

Mixer #110 is a 550 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M110C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0110 - Process

Item 37.19:

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

Emission Unit: 0-01001

Process: 111

Source Classification Code: 3-01-014-01

Process Description:

Mixer #111 is a 550 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M111C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0111 - Process

Item 37.20:

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

Emission Unit: 0-01001

Process: 112

Source Classification Code: 3-01-014-01

Process Description:

Mixer #112 is a 550 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.



Mixer #203 is a 2420 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M23AC - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M203A - Process

Item 37.24:

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

Emission Unit: 0-01001

Process: 204

Source Classification Code: 3-01-014-01

Process Description:

Mixer #204 is a 2420 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M24AC - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M204A - Process

Item 37.25:

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

Emission Unit: 0-01001

Process: 205

Source Classification Code: 3-01-014-01

Process Description:

Mixer #205 is a 2145 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M25AC - Control



Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M205A - Process

Item 37.26:

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

Emission Unit: 0-01001

Process: 206

Source Classification Code: 3-01-014-01

Process Description:

Mixer #206 is a 2200 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M206C - Control

Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0206 - Process

Item 37.27:

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

Emission Unit: 0-01001

Process: 207

Source Classification Code: 3-01-014-01

Process Description:

Mixer #207 is a 1870 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M207C - Control

Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0207 - Process

Item 37.28:

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

Emission Unit: 0-01001

Process: 208

Source Classification Code: 3-01-014-01

Process Description:

Mixer #208 is a 1000 gallon capacity vessel that is



utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M208C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0208 - Process

Item 37.29:

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

Emission Unit: 0-01001

Process: 209

Source Classification Code: 3-01-014-01

Process Description:

Mixer #209 is a 2420 gallon capacity vessel that is utilized for mixing and blending an array of solvents, rubbers, resins and additives into finished product. Raw materials are added to the mixing vessel, mixed and blended until they conform to quality standards. The finished product is then drawn off from the vessel, filtered and pumped into finished product containers. See applicable mixer arrangement drawing attached for additional information.

Emission Source/Control: M29AC - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M209A - Process

Item 37.30:

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

Emission Unit: 0-01001

Process: 210

Source Classification Code: 3-01-014-01

Process Description:

This process includes mixers 210, 211, and 212. Stir and blend mixers used for manufacture of broad array of voc/solvent based adhesives and coatings.

Emission Source/Control: M210C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M211C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M212C - Control
Control Type: REFRIGERATED CONDENSER



Emission Source/Control: M0210 - Process
Design Capacity: 1,925 gallons

Emission Source/Control: M0211 - Process
Design Capacity: 1,925 gallons

Emission Source/Control: M0212 - Process
Design Capacity: 2,000 gallons

Item 37.31:

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

Emission Unit: 0-01001
Process: 214 Source Classification Code: 3-01-014-01
Process Description:
Stirring and blending mixer used for manufacture of broad array of VOC/solvent-based adhesives and coatings.

Emission Source/Control: M214C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0214 - Process

Item 37.32:

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

Emission Unit: 0-01001
Process: 215 Source Classification Code: 3-01-014-01
Process Description:
Stirring and blending mixer used for manufacture of broad array of VOC/solvent-based adhesives and coatings.

Emission Source/Control: M215C - Control
Control Type: REFRIGERATED CONDENSER

Emission Source/Control: M0215 - Process

Item 37.33:

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

Emission Unit: 0-01021
Process: TTR Source Classification Code: 3-01-014-03
Process Description:
This process involves portable tote tank reconditioning and manual cleaning of 330-360 gallon portable tote tanks upon return from customers. Totes are cleaned with various solvents (primarily acetone) so that they can be reused for product shipment to customers.

Emission Source/Control: R0001 - Process

Item 37.34:



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

Emission Unit: 0-01041

Process: 041

Source Classification Code: 3-01-018-20

Process Description:

Production process for Dualite, a microscopic polymer sphere, is heated for expansion and blended with an inert such as calcium carbonate. The raw materials are conveyed, weighed, blended, heated for expansion and the finished product is pumped to storage tanks and later pumped into containers for sale. See the Buffalo Dualite process drawing for additional information. The process is referred to as either D-1 or "old line".

Emission Source/Control: E0001 - Control

Control Type: FABRIC FILTER

Emission Source/Control: E001A - Process

Item 37.35:

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

Emission Unit: 0-01041

Process: 946

Source Classification Code: 4-90-002-01

Process Description:

Storage tank T-46 contains Dualite finished product. The storage tank has a capacity of 420 cubic feet or 3142 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.

Emission Source/Control: T0046 - Process

Item 37.36:

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

Emission Unit: 0-01041

Process: 947

Source Classification Code: 4-90-002-01

Process Description:

Storage tank T-47 contains Dualite finished product. The storage tank has a capacity of 420 cubic feet or 3142 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.

Emission Source/Control: T0047 - Process

Item 37.37:

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

Emission Unit: 0-01041



Process: 948 Source Classification Code: 4-90-002-01

Process Description:

Storage tank T-48 contains Dualite finished product. The storage tank has a capacity of 420 cubic feet or 3142 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.

Emission Source/Control: T0048 - Process

Item 37.38:

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

Emission Unit: 0-01042

Process: 042

Source Classification Code: 3-01-018-20

Process Description:

Production process for Dualite, a microscopic polymer sphere, is heated for expansion and blended with an inert such as calcium carbonate. The raw materials are conveyed, weighed, blended, heated for expansion and the finished product is pumped to storage tanks and later pumped into containers for sale. See the Buffalo Dualite process drawing for additional information. The process is referred to as either D-2 or "new line".

Emission Source/Control: E0002 - Control

Control Type: FABRIC FILTER

Emission Source/Control: E002A - Process

Item 37.39:

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

Emission Unit: 0-01042

Process: 949

Source Classification Code: 4-90-002-01

Process Description:

Storage tank T-49 contains Dualite finished product. The storage tank has a capacity of 1050 cubic feet or 7855 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.

Emission Source/Control: T0049 - Process

Item 37.40:

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

Emission Unit: 0-01042

Process: 950

Source Classification Code: 4-90-002-01

Process Description:

Storage tank T-50 contains Dualite finished product. The



storage tank has a capacity of 1050 cubic feet or 7855 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.

Emission Source/Control: T0050 - Process

Item 37.41:

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

Emission Unit: 0-01042

Process: 951

Source Classification Code: 4-90-002-01

Process Description:

Storage tank t-51 contains Dualite finished product. The storage tank has a capacity of 1050 cubic feet or 7855 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.

Emission Source/Control: T0051 - Process

Item 37.42:

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

Emission Unit: 0-01042

Process: 952

Source Classification Code: 4-90-002-01

Process Description:

Storage tank T-52 contains Dualite finished product. The storage tank has a capacity of 1050 cubic feet or 7855 gallons. Solids finished product (Dualite) is pumped from the tank and filled in plastic lined cardboard containers. See attachments for a process diagram and additional product description.

Emission Source/Control: T0052 - Process

Item 37.43:

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

Emission Unit: 0-01043

Process: 043

Source Classification Code: 3-01-018-20

Process Description:

Production process for microsphere drying. The process is internally designated D-3 or "microsphere drying operation". Water content is removed from the raw material polymeric microscopic spheres. This takes place in a natural gas fired air stream. The dried material is separated from the air stream via cyclone. A baghouse collects residuals. The dried raw material is collected in fiber drums and is later introduced as a raw material in the Dualite production process. See attached drawing for



additional info.

Emission Source/Control: D0001 - Control
Control Type: FABRIC FILTER

Emission Source/Control: D001A - Process

Item 37.44:

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

Emission Unit: 0-01331

Process: 331

Source Classification Code: 3-01-014-01

Process Description:

Cowles mixer C-1 is a 10 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality standards. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.

Emission Source/Control: C0001 - Process

Item 37.45:

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

Emission Unit: 0-01331

Process: 332

Source Classification Code: 3-01-014-01

Process Description:

Cowles mixer C-2 is a 10 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality specs. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.

Emission Source/Control: C0002 - Process

Item 37.46:

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

Emission Unit: 0-01331

Process: 333

Source Classification Code: 3-01-014-01

Process Description:

Cowles mixer C-3 is a 110 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality standards. The finished product is gravity filtered from the tub and filled into finished



product containers. See applicable Cowles mixer arrangement drawing attached for additional information.

Emission Source/Control: C0003 - Process

Item 37.47:

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

Emission Unit: 0-01331

Process: 334

Source Classification Code: 3-01-014-01

Process Description:

Cowles mixer C-4 is a 110 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality specs. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.

Emission Source/Control: C0004 - Process

Item 37.48:

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

Emission Unit: 0-01331

Process: 335

Source Classification Code: 3-01-014-01

Process Description:

Cowles mixer C-5 is a 110 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality standards. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.

Emission Source/Control: C0005 - Process

Item 37.49:

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

Emission Unit: 0-01331

Process: 341

Source Classification Code: 3-01-014-01

Process Description:

Post mixer P-1 is a 110 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality specs. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.



Emission Source/Control: P0001 - Process

Item 37.50:

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

Emission Unit: 0-01331

Process: 342

Source Classification Code: 3-01-014-01

Process Description:

Post mixer P-2 is a 20 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the vessel, mixed and blended until they conform to quality standards. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable Cowles mixer arrangement drawing attached for additional information.

Emission Source/Control: P0002 - Process

Item 37.51:

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

Emission Unit: 0-01331

Process: 351

Source Classification Code: 3-01-014-01

Process Description:

Hoisted tub H-1 is a 110 gallon capacity tub that is utilized for mixing and blending an array of solvents, resins, rubbers and additives into finished product. Raw materials are added to the tub, mixed and blended until they conform to quality specs. The finished product is gravity filtered from the tub and filled into finished product containers. See applicable C&P mixer arrangement drawing attached for additional information.

Emission Source/Control: H0001 - Process

Item 37.52:

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

Emission Unit: 0-01901

Process: 901

Source Classification Code: 4-90-002-01

Process Description:

An aboveground storage tank, T0001, containing toluene with a 19400 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.

Emission Source/Control: T0001 - Control

Control Type: CONSERVATION VENT

Emission Source/Control: T001A - Control



Control Type: VAPOR LOCK BALANCE RECOVERY SYSTEM

Emission Source/Control: AST01 - Process

Item 37.53:

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

Emission Unit: 0-01901

Process: 902

Source Classification Code: 4-90-002-01

Process Description:

An aboveground storage tank, T0002, containing n-hexane with a 19400 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.

Emission Source/Control: T0002 - Control

Control Type: CONSERVATION VENT

Emission Source/Control: T002A - Control

Control Type: VAPOR LOCK BALANCE RECOVERY SYSTEM

Emission Source/Control: AST02 - Process

Item 37.54:

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

Emission Unit: 0-01901

Process: 903

Source Classification Code: 4-90-002-01

Process Description:

An aboveground storage tank, T0003, containing acetone with a 19400 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.

Emission Source/Control: T0003 - Control

Control Type: CONSERVATION VENT

Emission Source/Control: T003A - Control

Control Type: VAPOR LOCK BALANCE RECOVERY SYSTEM

Emission Source/Control: AST03 - Process

Item 37.55:

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

Emission Unit: 0-01901

Process: 904

Source Classification Code: 4-90-002-01

Process Description:

An aboveground storage tank, T0004, containing textile spirits with a 14000 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank.



Item 37.58:

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

Emission Unit: 0-01901

Process: 907

Source Classification Code: 4-90-002-01

Process Description:

An aboveground storage tank, T0007, containing methyl ethyl ketone with a 14000 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.

Emission Source/Control: T0007 - Control

Control Type: CONSERVATION VENT

Emission Source/Control: T007A - Control

Control Type: VAPOR LOCK BALANCE RECOVERY SYSTEM

Emission Source/Control: AST07 - Process

Item 37.59:

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

Emission Unit: 0-01901

Process: 908

Source Classification Code: 4-90-002-01

Process Description:

An aboveground storage tank, T0008, containing isopropyl alcohol with a 14000 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.

Emission Source/Control: T0008 - Control

Control Type: CONSERVATION VENT

Emission Source/Control: T008A - Control

Control Type: VAPOR LOCK BALANCE RECOVERY SYSTEM

Emission Source/Control: AST08 - Process

Item 37.60:

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

Emission Unit: 0-01901

Process: 909

Source Classification Code: 4-90-002-01

Process Description:

An aboveground storage tank, T0009, containing heptane with a 14000 gallon capacity. Tank trucks are unloaded by pump and solvent is transferred to the tank. Solvent is pumped from the tank and is metered into various mixing vessels via manifolded piping systems.

Emission Source/Control: T0009 - Control



Control Type: CONSERVATION VENT

Emission Source/Control: T009A - Control
Control Type: VAPOR LOCK BALANCE RECOVERY SYSTEM

Emission Source/Control: AST09 - Process
Design Capacity: 14,000 gallons

Item 37.61:

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

Emission Unit: 0-01901
Process: 910 Source Classification Code: 4-90-002-01

Process Description:
Storage tank T-10 contains n-propyl bromide, CAS #106-94-5. The AST capacity is 14000 gallons. Tank trucks are unloaded by pump and solvent is transferred to the AST. Solvent will be pumped from the AST and metered into various mixing vessels via manifolded piping systems.

Emission Source/Control: T0010 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: AST10 - Process
Design Capacity: 13,300 gallons

Item 37.62:

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

Emission Unit: 0-01901
Process: 977 Source Classification Code: 4-90-002-01

Process Description:
Storage tank T-77 contains finished product that contains ethyl acetate, toluene and lactol spirits. The AST capacity is 8,000 gallons. Raw materials are pumped into the tank and circulated and then pumped off through piping/filling station into containers.

Emission Source/Control: T0077 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: T077A - Process

Item 37.63:

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

Emission Unit: 0-01901
Process: 980 Source Classification Code: 4-90-002-01

Process Description:
Storage tank T-80 contains finished product that contains toluene, ethyl acetate, lactol spirits or methylene chloride. The AST capacity is 4,400 gallons. Finished product is pumped into the tank from mixing vessel(s). The



finished product is pumped from tank and filled into containers through a closed piping system.

Emission Source/Control: T0080 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: T080A - Process

Condition 38: Process Permissible Emissions
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 201-7.1

Item 38.1:

The sum of emissions from the regulated process cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 0-01001 Process: 210

CAS No: 0NY998-00-0
Name: VOC
PTE(s): 39 tons per year

Condition 39: Compliance Certification
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:40CFR 63.8005(a), Subpart HHHHH

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-01001 Emission Point: 0108X

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

Item 39.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

As required in §63.8005, for each stationary process vessel at an existing source, the facility must equip the vessel with a tightly fitting vented cover or lid that must be closed at all times when the vessel contains HAP, except for material additions and sampling.

The facility must comply with one of the following five options:

1. Reduce emissions of organic HAP with a vapor pressure



less than 0.6 kPa by at least 60% by weight. The 60% reduction requirement considers both capture and any combination of control devices (except a flare).

2. Reduce emissions of organic HAP by venting the emissions from a non-halogenated vent stream through a closed-vent system to a flare.
3. Reduce emissions of organic HAP with a vapor partial pressure less than 0.6 kPa by venting the emissions through a closed-vent system to a condenser that reduces the outlet gas temperature to < 10C.
4. Reduce emissions of organic HAP with a vapor partial pressure greater than 0.6 kPa but less than 17.2 kPa by venting the emissions through a closed-vent system to a condenser that reduces the outlet gas temperature to < 2 degrees C.
5. Reduce emissions of organic HAP with a vapor partial pressure greater than 17.2 kPa by venting the emissions through a closed-vent system to a condenser that reduces the outlet gas temperature to less than -5 degrees C.

Henkel has chosen Option #4. Prior to implementing a change to a different compliance option, Henkel must comply with the 60 day notification requirement per §63.8075(e)(8)(ii). Also, if the change in operating conditions is not considered to be within the previously established worst-case conditions, then a compliance demonstration must be performed within 360 hours per §63.8005(d)(4). Henkel may be required to submit a permit modification application.

To demonstrate continued compliance with this limit, the outlet gas temperature will be continuously monitored, recorded, and averaged on a daily basis per the requirements of §63.8005(d)(5), §63.990(c)(2), and §63.998(b).

Parameter Monitored: TEMPERATURE
Upper Permit Limit: 2 degrees Centigrade (or Celsius)
Monitoring Frequency: CONTINUOUS
Averaging Method: 24-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 40: Compliance Certification



Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:40CFR 63.8005(a), Subpart HHHHH

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-01331

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As required in §63.8005, for each portable process vessel at an existing source, the facility must equip the vessel with a cover or lid that must be in place at all times when the vessel contains a HAP, except for material additions and sampling.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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

Condition 41: Compliance Certification

Effective between the dates of 05/23/2008 and 05/22/2013

Applicable Federal Requirement:6NYCRR 229.3(e)(2)(iv)

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-01901

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity greater than or equal to 10,000 gallons but less than 20,000 gallons must be equipped with submerged fill. The permittee shall visually inspect the submerged fill line on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.



Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2008.

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



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

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

**Condition 44: Contaminant List
Effective between the dates of 05/23/2008 and 05/22/2013**

Applicable State Requirement:ECL 19-0301

Item 44.1:

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: 0NY998-00-0



Name: VOC

Condition 45: Unavoidable noncompliance and violations
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable State Requirement: 6NYCRR 201-1.4

Item 45.1:

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 46: Air pollution prohibited
Effective between the dates of 05/23/2008 and 05/22/2013

Applicable State Requirement:6NYCRR 211.2

Item 46.1:

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.

New York State Department of Environmental Conservation

Permit ID: 9-1402-00421/00049

Facility DEC ID: 9140200421

