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the truck bodies are molded (Emission Source: 7MOLD) and the molds in which the rear door frames and small parts are molded (Emission Source: PMOLD). These sources generate styrene and methyl methacrylate, two hazardous air pollutants (HAPs) which constitute the majority of emissions from the facility. Within 7MOLD, the emitting processes are the robotic application of polyester resin to the molds utilizing a low pressure, airless Venus-Gusmer H.I.S. Chopper Unit (SRE); the spray application of resin using a hand-held spray gun, an airless Venus Gusmer H.I.S. chopper spray gun (SRN); the manual application of gelcoat to the molds utilizing either a low pressure, airless Venus-Gusmer Pro-Series Gelcoater or a Glass Craft Indy X Gelcoat System (SGC); manual mold cleaning and waxing (CML and WML); the manual application of adhesives to bond reinforcing onto the truck bodies (BHO, BWA); the application of methyl methacrylate adhesive, Plexus, to bond together structural components utilizing a mechanical applicator (BMA); and the cleaning of application equipment with solvents (CEQ). To minimize particulate emissions, Unicell uses Stackguard high efficiency (99%) disposable fiberglass/polyester filters distributed by Airguard Industries, Inc. (Source Control: FMOLD/Emission Source: 7MOLD) on the intake of the exhaust duct for emission point MAIN. Within PMOLD the emitting processes are the manual application of polyester resin and gelcoat to the molds by brush (HRE, HGC); manual mold cleaning and waxing (CML and WML); the manual application of adhesives to bond reinforcing onto the truck bodies (BHO, BWA); and the cleaning of application equipment with solvents (CEQ). The other emission source in this emission unit is the area in which the truck bodies are assembled on the truck chassis (Emission Source: ASSEM). Within ASSEM, the emitting processes are the application of the methyl methacrylate adhesive, Plexus, to bond together structural components utilizing a mechanical applicator (BMA); the spraying of small quantities of bottled touch up paint to the truck bodies (STU); the manual application of paint to the truck floors using a roller and brush (HPT); and the manual application of caulk to the van bodies using a caulking gun (HCK). Unicell also operates a fiberglass trimming process which employs a dust collection system to minimize particulate emissions and is vented indoors.

Emission Unit B-PAINT is an undercoat booth in which all of the fiberglass truck bodies and some of the steel truck bodies are undercoated. If any of the bodies require finish paint, the truck is sent to another surface coating facility. Emission Unit B-PAINT has a single emission source, BOOTH and a single emission point, PAINT. The emitting processes in this emission unit are the manual application of undercoating to the truck bodies utilizing a Titan airless spray system (SPT) and the cleaning of the spray gun with thinners (CPT). To minimize particulate emissions, Unicell utilizes Stackguard high efficiency (99%) disposable fiberglass/polyester filters distributed by Airguard Industries, Inc. (Source Control: FILTR/Emission Source: BOOTH) on the intake of the exhaust duct for emission point PAINT.

Unicell uses a Uni-Ram model URS2000 acetone recycler which was purchased in December of 2005 and installed during the first quarter of 2006. Unicell also operates twenty-five natural gas fired heating units throughout the facility, with heat inputs ranging from 0.030 MMBTU/hr to 1.92 MMBTU/hr, that are exempt from permitting in accordance with 6NYCRR 201-3.2 (c) (1).

The facility-wide emissions of styrene exceeds the major source threshold of 10 tons per year for a single HAP listed in 6NYCRR Subpart 201-6 -Title V Facility Permits, therefore Unicell is subject to the provisions of Title V. Two factors have caused estimated styrene emissions to cross the 10 tpy threshold: 1) 1998 changes in the AP42 emissions factors table and 2) an increase in demand, and therefore production, of the fiberglass truck bodies. In addition, Unicell has an annual potential to emit greater than 50 tons of volatile organic compounds (VOCs) from emission sources subject to 6NYCRR Subpart 212.10 - "Reasonably available control technology for major facilities" or 6NYCRR Part 228 -



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"Surface Coating Processes", Section 228.8, Table 2. Both requirements have an applicability threshold of 50 tons per year (tpy) based on the potential to emit VOCs from all sources at the facility. Unicell has chosen to avoid being subject to the control requirements specified in Subpart 212.10 and Subpart 228.8 by limiting the amount of VOC's emitted from the facility to 49 tons per year determined by summing the individual monthly VOC emissions during any consecutive 12-month period. Emission points MAIN and PAINT are subject to the requirements of 6NYCRR212.4 (c) which limits the concentration of particulates in the exhaust to less than 0.05 grains per dry standard cubic foot and 6NYCRR212.6(a) which limits the average opacity of the emissions during any six consecutive minutes to less than 20%. To determine the impact that styrene and methyl methacrylate have on the surrounding residents and environment, Unicell must fulfill the stack test and air quality impact analysis requirements specified under 6NYCRR212.9. Unicell is also subject to the requirements of 6NYCRR211.2 to reduce fugitive emissions. Unicell operates the facility as a permanent total enclosure in accordance with USEPA Method 204 as described in the Operation and Maintenance Plan contained in Appendix B of the Title V permit. The permit specifies special operating conditions, recordkeeping and reporting required to verify compliance with these limits. The facility is currently in compliance with all requirements.

The United States Environmental Protection Agency (USEPA) has developed a National Emission Standard for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Manufacturing that requires the application of maximum achievable control technology (MACT) to reduce HAP emissions from the molding processes. Since Unicell has the potential to emit 10 or more tons per year of styrene, they had to comply with these requirements in accordance with 40CFR63, Subpart WWWW by April 21, 2006. Unicell submitted their final MACT Compliance Plan on April 17, 2006, which describes how they demonstrate compliance with the organic HAP emission limits and work practice standards specified in Subpart WWWW. Unicell submitted their Notification of Compliance on May 20, 2006. Unicell must also comply with MACT record keeping and reporting requirements. The MACT Compliance Plan is contained in Appendix A of the Title V permit.

The Title V permit contains a complete listing of the applicable federal, state and compliance monitoring requirements for the facility, its emission units and emission points. Appendix C contains a list of exempt activities as defined by 6NYCRR 201-3.2.

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 BORSCHEL
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 permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for permit renewals, modifications and transfers

Applications for Permit Renewals and Modifications

Permit modifications, suspensions or revocations by the Department

Permit Modifications, Suspensions and 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:



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

Item 4.1:

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 4.2:

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 4.3:

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

Item 5.1:

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

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

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

Item 6.1:

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;

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

Item 7.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: UNICELL BODY COMPANY INC
571 HOWARD ST
BUFFALO, NY 14206-2103

Facility: UNICELL BODY COMPANY INC
575 HOWARD ST
BUFFALO, NY 14206

Authorized Activity By Standard Industrial Classification Code:
3713 - TRUCK AND BUS BODIES

Permit Effective Date:

Permit Expiration Date:



LIST OF CONDITIONS

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 200.3: False statement
 - 24 6NYCRR 201-3.1(a): Exempt and Trivial Activities Applicability
 - 25 6NYCRR 201-6: Emission Unit Definition
 - 26 6NYCRR 201-6.5(c)(3): Compliance Certification
 - 27 6NYCRR 201-7: Facility Permissible Emissions
 - *28 6NYCRR 201-7: Capping Monitoring Condition
 - 29 6NYCRR 212.4(c): Compliance Certification
 - 30 6NYCRR 212.5(a): Emissions from two or more devices through one emission point
 - 31 6NYCRR 212.6(a): Compliance Certification
 - 32 6NYCRR 212.9: Compliance Certification
 - 33 6NYCRR 212.11(a): Sampling and Monitoring
 - 34 40CFR 63.10, Subpart A: § 63.10(b) General Recordkeeping Requirements
 - 35 40CFR 63.10, Subpart A: §63.10(d) General Reporting Requirements
- Emission Unit Level**
- 36 6NYCRR 201-6: Emission Point Definition By Emission Unit
 - 37 6NYCRR 201-6: Process Definition By Emission Unit

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EU=0-AMOLD

- 38 40CFR 63.9(h)(2)(i), Subpart A: Compliance Certification
- 39 40CFR 63, Subpart WWWW: Compliance Certification
- 40 40CFR 63.5785, Subpart WWWW: Sources subject to subpart WWWW
- 41 40CFR 63.5790, Subpart WWWW: Operations excluded from Subpart WWWW
- 42 40CFR 63.5790, Subpart WWWW: Operations included in an affected source
- 43 40CFR 63.5805, Subpart WWWW: Compliance Certification
- 44 40CFR 63.5805, Subpart WWWW: Compliance Certification
- 45 40CFR 63.5805, Subpart WWWW: Compliance Certification
- 46 40CFR 63.5805, Subpart WWWW: Compliance Certification
- 47 40CFR 63.5805(b), Subpart WWWW: Standards for existing facilities
that are not covered in §63.5805(a)
- 48 40CFR 63.5810, Subpart WWWW: General condition for open molding and
centrifugal casting operations
- 49 40CFR 63.5810(a), Subpart WWWW: Compliance Certification
- 50 40CFR 63.5810(b), Subpart WWWW: Compliance Certification
- 51 40CFR 63.5810(c), Subpart WWWW: Compliance Certification
- 52 40CFR 63.5835, Subpart WWWW: Compliance Certification
- 53 40CFR 63.5895(c), Subpart WWWW: Compliance Certification
- 54 40CFR 63.5900, Subpart WWWW: 5900(a)(4) - Continuous compliance with
work practice standards
- 55 40CFR 63.5900, Subpart WWWW: 5900(b) - Deviation reports
- 56 40CFR 63.5900, Subpart WWWW: 5900(c) - Limits and standards apply at
all times except during S/S/M
- 57 40CFR 63.5900, Subpart WWWW: Compliance Certification
- 58 40CFR 63.5905, Subpart WWWW: Compliance Certification
- 59 40CFR 63.5910(a), Subpart WWWW: Reports listed in table 14
- 60 40CFR 63.5910(b), Subpart WWWW: Schedule for semiannual reports
- 61 40CFR 63.5910(c), Subpart WWWW: Contents of semiannual reports
- 62 40CFR 63.5910(d), Subpart WWWW: Compliance Certification
- 63 40CFR 63.5910(g), Subpart WWWW: Reporting of deviations with
semiannual title V reports
- 64 40CFR 63.5915, Subpart WWWW: Compliance Certification
- 65 40CFR 63.5915, Subpart WWWW: Compliance Certification
- 66 40CFR 63.5915, Subpart WWWW: Compliance Certification
- 67 40CFR 63.5920, Subpart WWWW: Record retention : 5920(a)-(d)
- 68 40CFR 63.5925, Subpart WWWW: General provisions

EU=0-AMOLD,EP=0MAIN

- 69 40CFR 63, Subpart A: NESHAP General Provisions
- 70 40CFR 63.6(e)(1)(i), Subpart A: Operation and Maintenance Requirements

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 71 ECL 19-0301: Contaminant List



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- 72 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 73 6NYCRR 211.2: Air pollution prohibited
- 74 6NYCRR 211.2: Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 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



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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 - 6NYCRR 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

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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

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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



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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

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

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

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

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

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

**Condition 1: Acceptable Ambient Air Quality
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



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any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees
Effective for entire length of Permit

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

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective for entire length of Permit

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

Item 3.1:

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

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

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

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.
Effective for entire length of Permit

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



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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 for entire length of Permit

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.

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

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

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

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

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 6: Compliance Certification
Effective for entire length of Permit**

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and

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conditions contained in this facility permit include the following:

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



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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 BQA is as follows:

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

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective for entire length of Permit

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. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

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



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Condition 8: Recordkeeping requirements
Effective for entire length of Permit

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 for entire length of Permit

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 for entire length of Permit

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.



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Condition 11: Recycling and Salvage
Effective for entire length of Permit

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 for entire length of Permit

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 for entire length of Permit

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 for entire length of Permit

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.

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Condition 15: Standard Requirement - Provide Information
Effective for entire length of Permit

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 for entire length of Permit

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 for entire length of Permit

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:



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(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 for entire length of Permit

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 for entire length of Permit

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 for entire length of Permit

Applicable Federal Requirement: 6NYCRR 211.3

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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 for entire length of Permit**

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 for entire length of Permit**

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.**

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Condition 23: False statement
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 200.3

Item 23.1:

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 24: Exempt and Trivial Activities Applicability
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-3.1(a)

Item 24.1:

If the facility owner and/or operator performs any of the exempt and trivial activities listed in 6 NYCRR Part 201-3.2(c) or 201-3.3(c), such activities are exempt from the permitting provisions of 6 NYCRR Part 201-5, but not from other Parts of 6 NYCRR Chapter III, or from applicable permitting requirements of local air pollution control agencies.

Condition 25: Emission Unit Definition
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-6

Item 25.1:

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

Emission Unit: 0-AMOLD

Emission Unit Description:

Emission unit A-MOLD, the main emission unit at the facility, contains all the molding and assembly operations involved in manufacturing Unicell's fiberglass van bodies. The emission sources (ES) within this unit are fiberglass molds, ES 7MOLD and ES PMOLD, and the area in which the truck bodies are assembled on the truck chassis, ASSEM. The processes that take place within ES 7MOLD are the robotic and manual spray application of polyester resin (SRE, SRN) and gelcoat (SGC, MGC), the manual application of gelcoat, including catalyst, to a part being repaired, using a putty knife (RGC), manual application of polyester resin, including catalyst, to a part being repaired using a brush and roller (RRE), manual mold cleaning (CML) and waxing (WML), application of adhesives (BHO and BWA); application of the methyl methacrylate adhesive to bond together structural components utilizing a mechanical applicator (BMA), and the cleaning of equipment with

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solvents (CEQ). The processes that take place within ES PMOLD are the manual application of polyester resin (HRE) and gelcoat (HGC) to the molds by brush or roller; the manual application of gelcoat, including catalyst, to a part being repaired, using a putty knife (RGC), manual application of polyester resin, including catalyst, to a part being repaired using a brush and roller (RRE), manual mold cleaning (CML) and waxing (WML); the manual application of adhesives to bond reinforcing onto the truck bodies (BHO, BWA); and the cleaning of application equipment with solvents (CEQ). The processes that take place within ASSEM are the application of the methyl methacrylate adhesive to bond together structural components utilizing a mechanical applicator (BMA); spraying of small quantities of bottled touch up paint (STU) and manual application of paint (HPT) and caulking (HCK). The pollutants generated at these sources are volatile organic compounds (VOCs), particulates, and hazardous air pollutants (HAPs), including styrene and methyl methacrylate. Particulate emissions generated in ES 7MOLD by Processes SRE, SRN and SGC are controlled via disposable fiberglass/polyester filters with 99% capture efficiency, identified as Emission Source/Control FMOLD. This emission unit has a single emission point, MAIN. Unicell also operates a fiberglass trimming process which employs a dust collection system to minimize particulate emissions that is vented indoors.

Building(s): 575HOWARD
ASSEMBLY
INSTALL
MOLDSHOP

Item 25.2:

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

Emission Unit: B-PAINT

Emission Unit Description:

This emission unit (EU) consists of a spray booth, identified as Emission Source (ES) BOOTH, in which all of the fiberglass truck bodies and some of the steel truck bodies are undercoated. The pollutants generated at ES BOOTH include volatile organic compounds (VOCs), hazardous air pollutants (HAPs) and particulates. Particulate



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emissions are controlled via disposable fiberglass/polyester panel filters with 99% capture efficiency, identified as Emission Source/Control FILTR. The processes in this emission unit are: 1) SPT: The application of undercoating to truck bodies using an airless spray system; and 2) CPT: The cleaning of the spray guns with thinners. EU B-PAINT has a single emission point (EP), PAINT.

Building(s): ASSEMBLY

**Condition 26: Compliance Certification
Effective for entire length of Permit**

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

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Item 26.2:

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



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

**Condition 27: Facility Permissible Emissions
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-7

Item 27.1:

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

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

CAS No: 0NY998-00-0 PTE: 98,000 pounds per year
Name: VOC

**Condition 28: Capping Monitoring Condition
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-7

Item 28.1:

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 212.10
6NYCRR 228

Item 28.2:



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

Item 28.3:

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

Item 28.4:

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

Item 28.5:

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

Item 28.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 28.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Unicell Body Company, Inc. has an annual potential to emit (PTE) volatile organic compounds (VOCs) that exceeds the 50 tons per year (tpy) applicability threshold specified under 6NYCRR Subpart 212.10 - "Reasonably available control technology for major facilities" and 6NYCRR Part 228 - "Surface Coating Processes", Section 228.1 for sources listed in table 2. Unicell has chosen to accept limitations to restrict the amount of VOC's emitted from the facility to less than the 50 tpy to avoid the VOC control requirements set forth in Subpart 212.10 and Part 228. This condition summarizes special operating conditions to limit Unicell's PTE VOCs from sources throughout the facility to 49.0 tpy.

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Facility-wide emissions of VOCs shall not exceed the VOC emission rate of 49.0 tpy as determined by summing the individual monthly VOC emissions during any consecutive 12-month period. The Facility shall keep and maintain records to determine actual VOC emissions based on verifiable data from all sources, including trivial and/or exempt activities (excluding combustion sources). These records shall include the following information:

- 1) A current list of all resins, coatings, solvents, putties, adhesives and any other products used that contain VOCs. This list shall include information on the manufacturer, brand, product name or code, VOC content, manufacturer's product specifications and other pertinent information contained in material safety data sheets, material VOC content reports, and/or laboratory analyses;
- 2) A description of any equipment used, including type, make and model; maximum design process rate or throughput; control device(s) type and description (if any); and a description of the method(s) employed;
- 3) A monthly log of the consumption of each product used that contains VOCs,
- 4) All purchase orders, invoices, usage and production records and other documents to support information in the monthly log;
- 5) all calculations used to determine the monthly emissions.

Each calendar month, the facility-wide 12-month rolling total for VOC emissions shall be computed by adding the current monthly VOC emissions to the VOC emissions for the previous 11 months. Within 30 days following each calendar year, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the 49 ton per year limit imposed by the emissions cap. This shall include a VOC summary report which shall list the products used with reference to the associated process, the corresponding VOC contents, the quantities used monthly, emission factors used to calculate VOC emissions, with references cited, the monthly VOC emissions with the

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monthly total, the rolling 12-month VOC emissions for each consecutive month of the period and a comparison to the 49 tpy limit. All submittals to the Department shall be certified by the Facility's responsible official as to the truth, completeness, and accuracy of all information recorded and reported.

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

An exceedance of the VOC emission limit, failure to fulfill the recordkeeping and reporting requirements and/or failure to maintain the good housekeeping and work practices specified in this monitoring condition constitutes a violation of 6NYCRR212 and 6NYCRR228. Exceedance of the VOC limit must be reported to the Department within 30 days of occurrence.



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Parameter Monitored: VOC's
Upper Permit Limit: 49.0 tons per year
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 29.1:

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

Emission Unit: 0-AMOLD Emission Point: 0MAIN

Emission Unit: B-PAINT Emission Point: PAINT

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

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. To comply with this limit, Unicell shall use and maintain the spray booths, the application equipment and particulate control equipment contained in EU 0-AMOLD and EU B-PAINT in accordance with manufacturer's specifications and shall fulfill the monitoring requirements specified below. Spray application shall be carried out to minimize overspray and particulate emissions. The particulate filters shall cover the entire exhaust opening and shall be maintained to ensure maximum capture efficiency at all times. Compliance testing will be conducted at the discretion of the

Department.

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Operators of the paint spray booths contained in EU 0-AMOLD and EU B-PAINT must periodically monitor the booths and the accompanying particulate control device by completing the following tasks:

- Inspect the spray booth's filters daily for evidence that replacement is needed.
- Replace the filters as soon as such evidence is observed
- Each time a filter is replaced, the location of the filter, the date of replacement and the name of the staff person who replaced the filter shall be recorded in a logbook.
- whenever a problem with the particulate control device is discovered, the following information must be recorded in the log book: description of the problem, cause and corrective action taken.
- Regardless of when a problem is noted, e.g., at a time other than during the weekly inspection, it must be remedied immediately.
- To verify maintenance practices all purchase orders and invoices related to maintaining the spray booth, the spray guns, the control equipment and the maintenance and repair logbook shall be kept onsite and be readily available for review by representatives from NYSDEC upon request. All records shall be kept onsite for a minimum of five years.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: 5

Monitoring Frequency: DAILY

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 30: Emissions from two or more devices through one emission point
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 212.5(a)

Item 30.1:

This Condition applies to:

Emission Unit: 0AMOLD



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Emission Unit: BPAINT

Item 30.2:

Where air contaminants from two or more devices or contrivances are emitted to the outdoor atmosphere through a single emission point, the permissible emission rate or degree of air cleaning required is determined by using the sum of the process weights or emission rate potentials for all such devices or contrivances

Condition 31: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 31.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions 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 shall conduct observations of visible emissions from the emission points to which this condition applies at the monitoring frequency stated below while processes are in operation. The permittee shall immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this is zero percent opacity for many or all emission sources) and in compliance with section 212.6(a) are detected, the permittee shall determine the cause, make the necessary

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correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee shall immediately notify The Department. A certified visible emissions evaluator shall conduct a Method 9 assessment of the affected emission point(s) within 24 hours of such occurrence to determine the degree of opacity. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

Visible emissions observations, including the results of any Method 9 analysis, investigations and corrective actions shall be recorded in a bound logbook or other format acceptable to the Department and shall be kept on-site for five (5) years after the date of the last entry. The following data shall be recorded for each stack: date and time of day, observer's name, identity of emission point, weather condition, and whether or not a plume was observed, and, if a plume was observed, the cause/corrective action taken. Inclement weather conditions shall be recorded for those days when observations are prohibited. The semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

Compliance with these monitoring, recordkeeping and reporting requirements will verify compliance with 6NYCRR211.3.

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

Condition 32: Compliance Certification
Effective for entire length of Permit



Applicable Federal Requirement: 6NYCRR 212.9

Item 32.1:

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

Emission Unit: 0-AMOLD Emission Point: 0MAIN

Regulated Contaminant(s):

CAS No: 000080-62-6 METHYL ACRYLIC ACIDMETHYL ESTER
CAS No: 0NY998-00-0 VOC
CAS No: 000100-42-5 STYRENE

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Unicell Body Company (Unicell) is a reinforced plastic composites manufacturing facility that produces fiberglass truck bodies. The processes at Unicell generate considerable emissions of styrene and methyl methacrylate (MMA) and smaller amounts of several other volatile organic compounds/hazardous air pollutants. This facility is located in a potential environmental justice area in close proximity to residents and residential complaints have been ongoing. To determine the impact that these contaminants have on the surrounding residents and environment, the emission rate potential (ERP) of styrene, methyl methacrylate and total volatile organic compounds for EP 0MAIN shall be determined via Reference Method 18, Method TO-15 or another acceptable emissions testing method. The ERPs must be measured while operating all processes contained in Emission Unit 0-AMOLD at maximum capacity.

The stack test shall be conducted by April 30, 2008. Unicell shall notify the NYSDEC Region 9 office, in writing, not less than 30 days prior to the test, of the time and date of the test. This notification shall also include a stack test protocol describing the acceptable procedures to be used to stack test including sampling and analytical procedures and an acceptable method of determining the application rates for each process carried out during the stack test at maximum production rate.



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A report detailing stack test results must be submitted within 45 days after conducting the stack test. In addition, to assess the potential impacts on public health and the environment associated with long-term and acute exposures to styrene and MMA, an ambient air quality impact analysis of these contaminants using an acceptable computer model must be submitted within 60 days after conducting the stack test. The calculated annual and short-term impacts for each contaminant must be evaluated against its annual guideline concentration (AGC) and short-term ambient guideline concentration (SGC). Since the odor thresholds are very low for styrene and MMA and odor complaints from the neighboring residents have been a problem, odor detection values must also be used to evaluate acceptable short-term impacts for these contaminants. If the results for styrene and MMA are acceptable, further analysis will not be required. Otherwise, the analysis shall include the impact of other VOCs emitted, determined using the total VOC emission rate, application rates, MSDS's for products used in each process carried out during the stack test and any other relevant information.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 33: Sampling and Monitoring
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.11(a)

Item 33.1:

The owner and/or operator of this facility, if required by the department to conduct stack testing to demonstrate compliance with 6 NYCRR Part 212, must comply with notification requirements and conduct capture efficiency and/or stack testing using acceptable procedures pursuant to 6 NYCRR Part 202.

Condition 34: § 63.10(b) General Recordkeeping Requirements
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 34.1:

The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum the most recent 2 years of data shall be



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retained on site. The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source as described in 40 CFR 63.10 (b)(2).

**Condition 35: §63.10(d) General Reporting Requirements
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 35.1:

The owner or operator of an affected source subject to the reporting requirements under the general provisions shall submit reports to the Department in accordance with the reporting requirements in the relevant standards as described in 40 CFR 63.10 (d).

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

**Condition 36: Emission Point Definition By Emission Unit
Effective for entire length of Permit**

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-AMOLD

Emission Point: 0MAIN

Height (ft.): 86 Length (in.): 67 Width (in.): 48
NYTMN (km.): 4754.904 NYTME (km.): 187.028 Building: MOLDSHOP

Item 36.2:

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

Emission Unit: B-PAINT

Emission Point: PAINT

Height (ft.): 35 Diameter (in.): 48
NYTMN (km.): 4754.889 NYTME (km.): 187.016 Building: ASSEMBLY

**Condition 37: Process Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-6

Item 37.1:

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

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Emission Unit: 0-AMOLD

Process: BHO

Source Classification Code: 3-08-007-04

Process Description:

This is the application of urethane adhesive, betaseal, to the interior structure of the truck body. The tool used is a mechanical applicator.

Emission Source/Control: 7MOLD - Process

Item 37.2:

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

Emission Unit: 0-AMOLD

Process: BMA

Source Classification Code: 3-08-007-04

Process Description:

This is the application of a methyl methacrylate adhesive, plexus, to bond together structural components. The tool used is a mechanical applicator.

Emission Source/Control: 7MOLD - Process

Emission Source/Control: ASSEM - Process

Item 37.3:

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

Emission Unit: 0-AMOLD

Process: BWA

Source Classification Code: 4-02-016-99

Process Description:

This is the manual application of polyester putty to the front wall reinforcing of a truck body. The tool used is a putty knife.

Emission Source/Control: 7MOLD - Process

Item 37.4:

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

Emission Unit: 0-AMOLD

Process: CEQ

Source Classification Code: 3-08-007-99

Process Description:

This is the cleaning of spray and other application equipment using acetone and lacquer thinners. The tools used are brushes and rags.

Emission Source/Control: 7MOLD - Process

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Item 37.5:

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

Emission Unit: 0-AMOLD

Process: CML

Source Classification Code: 3-08-007-02

Process Description:

This is the cleaning of a mold using mold release TR 210 and TR 211. The tool used is a rag.

Emission Source/Control: 7MOLD - Process

Item 37.6:

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

Emission Unit: 0-AMOLD

Process: HCK

Source Classification Code: 4-02-016-99

Process Description:

This is the application of caulking, all-pro acrylic, to the floor/wall joint of a truck body. The tool used is a caulking gun.

Emission Source/Control: ASSEM - Process

Item 37.7:

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

Emission Unit: 0-AMOLD

Process: HGC

Source Classification Code: 3-08-007-21

Process Description:

This is the manual application of gelcoat, including catalyst, to a mold. The tool used is a paintbrush.

Emission Source/Control: PMOLD - Process

Item 37.8:

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

Emission Unit: 0-AMOLD

Process: HPT

Source Classification Code: 4-02-016-99

Process Description:

This is the manual application of paint to the floor of a truck body. The tool used is a paint roller.

Emission Source/Control: ASSEM - Process

Item 37.9:



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

Emission Unit: 0-AMOLD

Process: HRE

Source Classification Code: 3-08-007-23

Process Description:

This is the manual application of polyester resin, including catalyst, to a mold. The tools used are a brush and a roller.

Emission Source/Control: PMOLD - Process

Item 37.10:

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

Emission Unit: 0-AMOLD

Process: MGC

Source Classification Code: 3-08-007-22

Process Description:

This is the spray application of gelcoat, including catalyst, to a fiberglass pattern in the construction of a mold. The tool used is a siphon or pressure feed sprayer.

Emission Source/Control: FMOLD - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: 7MOLD - Process

Item 37.11:

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

Emission Unit: 0-AMOLD

Process: RGC

Source Classification Code: 3-08-007-21

Process Description:

This is the manual application of gelcoat, including catalyst, to a part being repaired. The tool used is a putty knife.

Emission Source/Control: 7MOLD - Process

Item 37.12:

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

Emission Unit: 0-AMOLD

Process: RRE

Source Classification Code: 3-08-007-23

Process Description:

This is the manual application of polyester resin,

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including catalyst, to a part being repaired. The tools used are a brush and roller.

Emission Source/Control: 7MOLD - Process

Item 37.13:

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

Emission Unit: 0-AMOLD

Process: SGC

Source Classification Code: 3-08-007-22

Process Description:

This is the spray application of gelcoat, including catalyst, to a fiberglass mold. The tool used is a low pressure, airless Venus-Gusmer Pro-Series Gelcoater spray gun or low pressure, airless Glass Craft Indy X spray gun. Approximately six molds are gelcoated each day, utilizing 0.75-1.5 hours per unit for the application (5-9 hours total spraying time). Gelcoat and resin can be applied to separate molds simultaneously.

Emission Source/Control: FMOLD - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: 7MOLD - Process

Item 37.14:

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

Emission Unit: 0-AMOLD

Process: SRE

Source Classification Code: 3-08-007-24

Process Description:

This is the robotic spray application of polyester resin, including catalyst, to a fiberglass mold. The tool used is a low pressure, airless Venus-Gusmer H.I.S. Chopper spray gun. Approximately six molds are coated each day, utilizing 0.75-1.5 hours per unit for the application (5-9 hours total spraying time). Gelcoat and resin can be applied to separate molds simultaneously.

Emission Source/Control: FMOLD - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: 7MOLD - Process

Item 37.15:



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

Emission Unit: 0-AMOLD

Process: SRN

Source Classification Code: 3-08-007-24

Process Description:

This is the spray application of resin using a hand-held, airless Venus Gusmer H.I.S. chopper spray gun.

Emission Source/Control: FMOLD - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: 7MOLD - Process

Item 37.16:

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

Emission Unit: 0-AMOLD

Process: STU

Source Classification Code: 4-02-016-20

Process Description:

This is the touch up of small blemishes in the truck chassis using small aerosol spray cans.

Emission Source/Control: ASSEM - Process

Item 37.17:

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

Emission Unit: 0-AMOLD

Process: WML

Source Classification Code: 3-08-007-99

Process Description:

This is the application of wax, paste wax TR 100 to a fiberglass mold. The tool used is a rag.

Emission Source/Control: 7MOLD - Process

Item 37.18:

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

Emission Unit: B-PAINT

Process: CPT

Source Classification Code: 4-02-016-05

Process Description:

This is the cleaning of the undercoat spray gun using thinners.

Emission Source/Control: FILTR - Control

Control Type: FIBERGLASS FILTER



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Emission Source/Control: BOOTH - Process

Item 37.19:

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

Emission Unit: B-PAINT

Process: SPT

Source Classification Code: 4-02-016-07

Process Description:

This is the application of undercoating to cube vans using a Titan airless spray system, Model LX50.

Emission Source/Control: FILTR - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: BOOTH - Process

**Condition 38: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.9(h)(2)(i), Subpart A

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 000080-62-6 METHYL ACRYLIC ACIDMETHYL ESTER

CAS No: 0NY100-00-0 HAP

CAS No: 000100-42-5 STYRENE

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(2)(i) Before a title V permit has been issued to the owner or operator of an affected source, and each time a notification of compliance status is required under this part, the owner or operator of such source shall submit to the Administrator a notification of compliance status, signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied with the relevant standard. The notification shall list—

(A) The methods that were used to determine

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compliance;

(B) The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

(C) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

(D) The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard;

(E) If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification);

(F) A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and

(G) A statement by the owner or operator of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 39: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63, Subpart WWWW

Item 39.1:

The Compliance Certification activity will be performed for:



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Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 000080-62-6 METHYL ACRYLIC ACID METHYL ESTER

CAS No: 000100-42-5 STYRENE

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Unicell shall verify compliance with 40CFR63, Subpart WWWW in accordance with the final MACT Compliance Plan submitted to NYSDEC in April 2006. If Unicell chooses to change the compliance option specified in the Plan, a revised MACT Compliance Plan must be submitted to NYSDEC for review and approval prior to changing the compliance option. Unicell's MACT Compliance Plan is contained in Appendix A of the title V permit.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 40: Sources subject to subpart WWWW
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.5785, Subpart WWWW

Item 40.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 40.2:

The facility is subject to Subpart WWWW if the facility owns or operates a reinforced plastic composites production facility that is located at a major source of hazardous air pollutants (HAPs).

Reinforced plastic composites production is limited to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product.

Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites.

Condition 41: Operations excluded from Subpart WWWW



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Applicable Federal Requirement: 40CFR 63.5790, Subpart WWWW

Item 41.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 41.2:

The following operations are specifically excluded from any requirements in subpart WWWW:

- application of mold sealing and release agents
- mold stripping and cleaning
- repair of parts that were not manufactured at this facility, including non-routing manufacturing of parts
- personal activities that are not part of the manufacturing operations (such as hobby shops on military bases)
- prepreg materials as defined in §63.5935
- non-gel coat surface coatings
- application of putties, polyputties, and adhesives
- repair or production materials that do not contain resin or gel coat
- research and development operations as defined in §112(c)(7) of the Clean Air Act
- polymer casting
- closed molding operations (except for compression/injection molding)

The exclusion of certain operations from any requirements applies only to operations specifically listed in this condition. The requirements for any co-located operations still apply.

Condition 42: Operations included in an affected source
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5790, Subpart WWWW

Item 42.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 42.2:

The affected source consists of all parts of the facility which are engaged in the following operations:

- open molding
- closed molding
- centrifugal casting
- continuous lamination
- continuous casting
- polymer casting
- pultrusion
- sheet molding compound (SMC) manufacturing
- bulk molding compound (BMC) manufacturing
- mixing
- cleaning of equipment used in reinforced plastic composites manufacture
- HAP-containing materials storage



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- repair operations on parts also manufactured

Condition 43: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5805, Subpart WWWW

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

If the facility is an open molding,
non-corrosion-resistant and/or high strength (non-CR/HS)
operation, and the facility uses a mechanical resin
application, then the organic HAP emission limit is 88
lb/ton.

The facility may elect to comply with this limit using any
of the options listed in §63.5810-5830.

Parameter Monitored: HAP

Upper Permit Limit: 88 pounds per ton

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 44: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5805, Subpart WWWW

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD



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Permit ID: 9-1402-00696/00007

Facility DEC ID: 9140200696

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

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

If the facility is an open molding, non-corrosion-resistant and/or high strength (non-CR/HS) operation, and the facility uses a manual resin application, then the organic HAP emission limit is 87 lb/ton.

The facility may elect to comply with this limit using any of the options listed in §63.5810-5830.

Parameter Monitored: HAP

Upper Permit Limit: 87 pounds per ton

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 45: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5805, Subpart WWWW

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

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

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

If the facility has an open molding gel coating operation using a white/off-white pigmented gel coating application, then the facility must meet an organic HAP emission limit of 267 lb/ton.



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The facility may elect to comply with this emission limit using any options described in §63.5810-5830.

Parameter Monitored: HAP
Upper Permit Limit: 267 pounds per ton
Monitoring Frequency: MONTHLY
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 46: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5805, Subpart WWWW

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

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

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

If the facility has an open molding gel coat operation using a pigmented gel coating application that is not white/off-white, then the facility must meet an organic HAP emission limit of 377 lb/ton.

The facility may elect to comply with this emission limit using any options described in §63.5810-5830.

Parameter Monitored: HAP
Upper Permit Limit: 377 pounds per ton
Monitoring Frequency: MONTHLY
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 47: Standards for existing facilities that are not covered in



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Facility DEC ID: 9140200696

§63.5805(a)

Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5805(b), Subpart WWWW

Item 47.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 47.2:

All operations at existing facilities that are not listed in §63.5805(a) [centrifugal casting and continuous lamination/casting operations] must meet the organic HAP emission limits in Table 3 of subpart WWWW and the work practice standards listed in Table 4 of subpart WWWW that apply, regardless of the quantity of HAP used.

Condition 48: General condition for open molding and centrifugal casting operations

Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5810, Subpart WWWW

Item 48.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 48.2:

The facility must use one of the methods listed in §63.5810(a)-(d) to meet the standards for open molding or centrifugal casting operations in table 3 or 5 of subpart WWWW.

The facility may use any control method that reduces organic HAP emissions, including reducing resin and gel coat organic HAP content, changing to nonatomized mechanical application, using covered curing techniques, and routing part or all of the emissions to an add-on control device.

The facility may use different compliance options for the different operations listed in tables 3 or 5.

The necessary calculations must be completed within 30 days after the end of each month.

The facility may switch between the compliance options. When the facility changes to an option based on a 12-month rolling average, the facility must base the average on the previous 12 months of data calculated using the compliance option the facility is changing to, unless the facility was previously using an option that did not require the facility to maintain records of resin and gel coat use. In this case, the facility must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

Condition 49: Compliance Certification

Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5810(a), Subpart WWWW



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Permit ID: 9-1402-00696/00007

Facility DEC ID: 9140200696

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must calculate the actual organic HAP emissions factor for each different process stream within each operation type. The process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique.

The facility must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in table 1 of subpart WWWW for open-molding and for centrifugal casting, or site-specific organic HAP emissions factors discussed in §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add-on controls.

If the facility is using vapor suppressants to reduce HAP emissions, the facility must determine the vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A of subpart WWWW.

If the facility is using add-on control to reduce HAP emissions, the facility must determine the add-on control factor by conducting capture and control efficiency testing using the procedures specified in §63.5850. The organic HAP emissions factor calculated from the equations in table 1 of subpart WWWW, or a site-specific emissions factor, is multiplied by the add-on control factor to calculate the organic HAP emissions factor after control.



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Use equation 1 listed in §63.5810(a) to calculate the add-on control factor used in the organic HAP emissions factor equations.

If the calculated emissions factor is less than or equal to the appropriate emission limit, the facility has demonstrated that this process stream complies with the emission limit in table 3. It is not necessary that all process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat the facility uses, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in §63.5810(b)-(d), then all process streams using that individual resin or gel coat must be included in the averaging calculations.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 50: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5810(b), Subpart WWWW

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must demonstrate that on average the facility met the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in table 3 of subpart WWWW that applies.

The facility shall group the process streams described in

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§63.5810(a) by operation type and resin application method or gel coat type listed in table 3 of subpart WWWW and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months using equation 2 as listed in §63.5810(b)(1).

The facility may, but is not required to, include process streams where the facility has demonstrated compliance as described in §63.5810(a), subject to the limitations described in §63.5810(a)(2), and the facility is not required to and should not include process streams for which the facility will demonstrate compliance using the procedures in §63.5810(d).

The facility shall compare each organic HAP emission factor calculated above with its corresponding organic HAP emission limit in table 3 of subpart WWWW. If all emission factors are equal to or less than the corresponding emission limit, then the facility is in compliance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 51: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5810(c), Subpart WWWW

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



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The facility shall demonstrate each month that the facility meets each weighted average of the organic HAP emission limits in table 3 or 5 of subpart WWWW that apply. When using this option, the facility must demonstrate compliance with the weighted average organic HAP emission limit for all open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emission limit for all centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

Each month the facility must calculate the weighted average organic HAP emission limit for all open molding operations and the weighted average organic HAP emission limit for all centrifugal casting operations for the facility for the last 12-month period to determine the organic HAP emission limit that the facility must meet by using equation 3 listed in §63.5810(c)(1).

Each month the facility must then calculate the weighted average organic HAP emission factor for open molding and centrifugal casting by using equation 4 as listed in §63.5810(c)(2).

The facility shall then compare the values calculated above and if each 12-month rolling average organic HAP emission factor is less than or equal to the corresponding 12-month rolling average organic HAP emission limit, then the facility is in compliance.

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 52: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5835, Subpart WWWW

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD



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

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) The facility must be in compliance at all times with the work practice standards in table 4 of subpart WWWW, as well as the organic HAP emission limits in tables 3 or 5, or the organic HAP content limits in table 7, as applicable, that the facility is meeting without the use of add-on controls.

(b) The facility must be in compliance with all organic HAP emission limits in subpart WWWW that the facility meets using add-on controls, except during periods of startup, shutdown, and malfunction.

(c) The facility must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

(d) The facility must develop a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3) for any organic HAP emission limits the facility meets using an add-on control.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 53: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5895(c), Subpart WWWW

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

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

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Item 53.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the facility is meeting any organic HAP emission limit based on an organic HAP emission limit in tables 3 or 5 of subpart WWWW.

The facility must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the facility is meeting any organic HAP content limits in table 7 of subpart WWWW if the facility is averaging organic HAP contents.

Resin use records may be based on purchase records if the facility can reasonably estimate how the resin is applied.

The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 54: 5900(a)(4) - Continuous compliance with work practice standards
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.5900, Subpart WWWW

Item 54.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 54.2:

Compliance with the work practice standards in table 4 of subpart WWWW is demonstrated by performing the work practice required for the operation.

**Condition 55: 5900(b) - Deviation reports
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.5900, Subpart WWWW

Item 55.1:



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This Condition applies to Emission Unit: 0-AMOLD

Item 55.2:

The facility must report each deviation from each standard in §63.5805 that applies. The deviations must be reported according to the requirements in §63.5910.

Condition 56: 5900(c) - Limits and standards apply at all times except during S/S/M Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5900, Subpart WWWW

Item 56.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 56.2:

Except as provided in §63.5900(d), during periods of startup, shutdown, or malfunction, the facility must meet the organic HAP emission limits and work practice standards that apply to the facility.

Condition 57: Compliance Certification Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5900, Subpart WWWW

Item 57.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 57.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Compliance with organic HAP emission limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emission limit listed in table 3 or 5 of subpart WWWW, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d).

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 58: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5905, Subpart WWWW

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

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

Item 58.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit all of the notifications in table 13 of subpart WWWW that apply by the dates specified in table 13. The notifications are described in more detail in 40CFR63, subpart A, referenced in table 13.

If the facility changes any information submitted in any notification, the facility must submit the changes in writing to NYSDEC within 15 calendar days after the change.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 59: Reports listed in table 14
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5910(a), Subpart WWWW

Item 59.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 59.2:

The facility shall submit all of the reports listed in table 14 of subpart WWWW which apply to the facility.



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**Condition 60: Schedule for semiannual reports
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.5910(b), Subpart WWWW

Item 60.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 60.2:

Unless NYSDEC has approved a different schedule for submission of reports under §63.10(a), the facility must submit each report by the date specified in table 14 and according to the following schedule:

- 1) The first compliance report must cover the period beginning on the compliance date that is specified for the affected source in §63.5800 and ending on June 30 or December 31, whichever is the first date following the end of the first calendar half after the compliance date that is specified in §63.5800.
- 2) The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source in §63.5800.
- 3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- 4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- 5) For each affected source that is subject to permitting requirements pursuant to 40CFR70 or 71, the facility may submit the first and subsequent compliance reports according to the dates that NYSDEC has established instead of according to the dates above.

**Condition 61: Contents of semiannual reports
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.5910(c), Subpart WWWW

Item 61.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 61.2:

The compliance report must contain the information below:

- 1) Company name and address
- 2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the contents of the report.
- 3) Date of the report and beginning and ending dates of the reporting period.
- 4) If the facility had a startup, shutdown, or malfunction during the reporting period and the facility took actions consistent with the startup, shutdown, and malfunction plan, the compliance report must include



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the information in §63.10(d)(5)(i).

5) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in table 4 of subpart WWWW, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.

6) If there were no periods during which the continuous monitoring system (CMS), including a continuous emissions monitoring system (CEMS) and an operating parameter monitoring system were out of control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out of control during the reporting period.

Condition 62: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5910(d), Subpart WWWW

Item 62.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 62.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each deviation from an organic HAP emission limitation (i.e., emissions limit and operating limit) and for each deviation from the requirements for work practice standards that occurs at an affected source where the facility is not using a CMS to comply with the organic HAP emissions limitations or work practice standards in subpart WWWW, the compliance report must contain the information in §63.5910(c)(1)-(4) and below. this includes periods of startup, shutdown, and malfunction.

1) The total operating time of each affected source during the reporting period.

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



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 63: Reporting of deviations with semiannual title V reports
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.5910(g), Subpart WWWW

Item 63.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 63.2:

Each affected source that has obtained a title V operating permit pursuant to 40CFR70 or 71 must report all deviations as defined in subpart WWWW in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to table 14 of subpart WWWW along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any organic HAP emissions limitations (including any operating limit) or work practice requirement in subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the NYSDEC.

**Condition 64: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.5915, Subpart WWWW

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 64.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must keep records listed below:

- 1) A copy of each notification and report that the facility submitted to comply with subpart WWWW, including all documentation supporting any Initial Notification or



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Notification of Compliance Status that the facility submitted, according to the requirements in §63.10(b)(2)(xiv).

2) The records in §63.6(e)(3)(iii)-(v) related to startup, shutdown, and malfunction.

3) Records of performance tests, design, and performance evaluations as required in §63.10(b)(2).

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 65: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5915, Subpart WWWW

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 65.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in tables 3, 5, and 7 of subpart WWWW.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 66: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.5915, Subpart WWWW

Item 66.1:



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The Compliance Certification activity will be performed for:

Emission Unit: 0-AMOLD

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 66.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must keep a certified statement that the facility is in compliance with the work practice standards in table 4 of subpart WWW that apply.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 67: Record retention : 5920(a)-(d)
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.5920, Subpart WWW

Item 67.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 67.2:

The facility must maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to §63.10(b)(1).

As specified in §63.10(b)(1), the facility must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

The facility must keep each record onsite for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The facility can keep the records offsite for the remaining three years.

The facility may keep records in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

**Condition 68: General provisions
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.5925, Subpart WWW



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Item 68.1:

This Condition applies to Emission Unit: 0-AMOLD

Item 68.2:

Table 15 of subpart WWWW shows which parts of the general provisions listed in subpart A of 40CFR63 apply to the facility.

**Condition 69: NESHAP General Provisions
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63, Subpart A

Item 69.1:

This Condition applies to Emission Unit: 0-AMOLD Emission Point: 0MAIN

Item 69.2:

This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

**Condition 70: Operation and Maintenance Requirements
Effective for entire length of Permit**

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

Item 70.1:

This Condition applies to Emission Unit: 0-AMOLD Emission Point: 0MAIN

Item 70.2:

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

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



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 71: Contaminant List
Effective for entire length of Permit**

Applicable State Requirement: ECL 19-0301

Item 71.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this

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permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0

Name: HAP

CAS No: 000080-62-6

Name: METHYL ACRYLIC ACIDMETHYL ESTER

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 000100-42-5

Name: STYRENE

CAS No: 0NY998-00-0

Name: VOC

**Condition 72: Unavoidable noncompliance and violations
Effective for entire length of Permit**

Applicable State Requirement: 6NYCRR 201-1.4

Item 72.1:

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



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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 73: Air pollution prohibited
Effective for entire length of Permit

Applicable State Requirement: 6NYCRR 211.2

Item 73.1:

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

Condition 74: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement: 6NYCRR 211.2

Item 74.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 74.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

Unicell's Operation and Monitoring (O&M) Plan for the Control of Fugitive Emissions in accordance with USEPA Method 204 - Criteria for and Verification of a Permanent or Temporary Total Enclosure is contained in Appendix B of this title V permit. To capture fugitive VOC emissions from the MOLDSHOP and ASSEMBLY buildings for discharge through Emission Point OMAIN and to reduce the health and environmental impact of fugitive emissions on the neighboring residents, Unicell must operate the facility in accordance with this plan at all times that open molding and other VOC emitting activities are conducted at the facility. Anytime a change is made to the O&M Plan, the modified plan must be submitted to NYSDEC for review and approval prior to changing procedures at the facility.

Reference Test Method: Method 204

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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