

**New York State Department of Environmental Conservation
Facility DEC ID: 9144400012**



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

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1444-00012/00021
Effective Date: 02/11/2002 Expiration Date: No expiration date

Permit Issued To: FLEXOVIT USA INC
PO BOX 269
ANGOLA, NY 14006-0269

Contact: BOB RIEHLE
1305 EDEN EVANS RD
FLEXOVIT
ANGOLA, NY 14006
(716) 549-5100

Facility: FLEXOVIT USA
1305 EDEN EVANS CTR RD
ANGOLA, NY 14006-9734

Contact: JAMES H LEITTEN
1305 EDEN-EVANS RD
ANGOLA, NY 14006
(716) 549-5100

Description:

Flexovit operates a manufacturing complex consisting of two buildings on approximately 34 acres of property. The primary product manufactured is abrasive grinding wheels. Operations include mixing, pressing, curing, drying, printing, cleaning and other miscellaneous support activities. Flexovit employs approximately 200 persons.

The permit consists of three emission units as follows:

- Emission unit 1 contains two processes, process 1 is the curing of mechanically pressed grinding wheels and process two is the mixing of the batch compositions.
- Emission unit 2 is the coating of a fiberglass substrate using a polymer coating.
- Emission Unit 3 consists of miscellaneous support activities such as aluminum plate cleaning, manual finishing by grinding of wheels and label application, a small zinc die cast station, and a lithographic press for labels.

The facility emissions of Volatile Organic Compounds (VOC's) and Hazardous Air Pollutants (HAP's) exceed the Title V thresholds based on Emission Rate Potential. This permit contains a "CAP" under 6NYCRR 201-6 limiting emissions of VOC's, total HAP's and any individual HAP to less than the Title V thresholds of 50, 25 and 10 tons per year respectively. The VOC cap of less than 50 tons per year also is effective in "Capping " the facility out of the requirements for implementing Reasonable Available Control Technology for VOC sources as specified under 6 NYCRR part 212-10 and for the control requirements for VOC emissions from graphic arts processes, (Lithographic press Emission Unit 3),



New York State Department of Environmental Conservation
Facility DEC ID: 9144400012

under 6 NYCRR part 234. Records of emissions determined by tracking VOC and HAP usage will be used to demonstrate compliance with the "cap" based on a 12 month rolling average.

Emission unit 2, polymeric coating of the fiberglass substrate, is subject to the requirements of 6 NYCRR part 228 and must maintain an overall removal and destruction efficiency of 81 % for VOC's. An afterburner is used to control emissions and temperature monitored to determine compliance. A stack test for the determination of capture and destruction efficiency is required in this permit. This Emission Unit is also subject to the record keeping requirements of the NSPS subpart VVV , Standards of Performance for Polymeric Coating of Supporting Substrates. The potential emissions of 69.19 tons per year from this coater is less than the applicability requirement for control of 104.7 tons per year in 40 cfr 60 subpart VVV.

The stacks are also subject to the opacity limitations under 6 NYCRR 212.6. 40 cfr 60 subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations does not apply to the lithographic press described under emission unit 3 because it does not fit the definition of a coating applicator in that the web is not continuously coated.

Annual reports are required to be submitted to this office summarizing the compliance status of the facility with the requirements of this permit.

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: RICHARD P SWEENEY
 DIVISION OF ENVIRONMENTAL PERMITS
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9
HEADQUARTERS



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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

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

New York State Department of Environmental Conservation
Facility DEC ID: 9144400012



Item 4.1:

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

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

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

**Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 9
 HEADQUARTERS
 Applicable State Requirement: 6NYCRR 621.5(a)**

Item 5.1:

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

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



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: FLEXOVIT USA INC
PO BOX 269
ANGOLA, NY 14006-0269

Facility: FLEXOVIT USA
1305 EDEN EVANS CTR RD
ANGOLA, NY 14006-9734

Authorized Activity By Standard Industrial Classification Code:
3291 - ABRASIVE PRODUCTS



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 20 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 3 6NYCRR 200.7: Maintenance of equipment
- 6 6NYCRR 201-1.7: Recycling and Salvage
- 7 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the Air
- 9 6NYCRR 201-3.2(a): Proof of Eligibility
- 10 6NYCRR 201-3.3(a): Proof of Eligibility
- 16 6NYCRR 202-1.1: Required emissions tests
- 17 6NYCRR 211.3: Visible emissions limited.
- 1 6NYCRR 200.5: Sealing
- 2 6NYCRR 200.6: Acceptable ambient air quality
- 4 6NYCRR 201-1.2: Unpermitted Emission Sources
- 5 6NYCRR 201-1.5: Emergency Defense
- 8 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 11 6NYCRR 201-6: Facility Permissible Emissions
- *12 6NYCRR 201-6: Compliance Demonstration
- *13 6NYCRR 201-6: Compliance Demonstration
- *14 6NYCRR 201-6: Compliance Demonstration
- 15 6NYCRR 201-6.5(g): Non Applicable requirements
- 18 6NYCRR 212.10: Facility Permissible Emissions
- *19 6NYCRR 212.10: Compliance Demonstration
- 21 6NYCRR 226: Equipment Specifications for Cold Cleaning Batch Degreasing

Emission Unit Level

EU=U-00001,Proc=001

- 22 6NYCRR 212.4(a): Compliance Demonstration
- 23 6NYCRR 212.6(a): Compliance Demonstration

EU=U-00002

- 24 6NYCRR 228.10: Compliance Demonstration

EU=U-00002,Proc=003

- 25 6NYCRR 228.3: Compliance Demonstration
- 26 6NYCRR 228.4: Compliance Demonstration
- 27 6NYCRR 228.5(g): Compliance Demonstration
- 28 40CFR 60.744(b), NSPS Subpart VVV: Compliance Demonstration
- 29 40CFR 60.747(c), NSPS Subpart VVV: Compliance Demonstration

EU=U-00003,Proc=009

- 30 6NYCRR 234.1: Compliance Demonstration



STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 31 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 32 6NYCRR 201-5: General Provisions
- 33 6NYCRR 201-5: Permit Exclusion Provisions
- 34 6NYCRR 201-5: Emission Unit Definition
- 35 6NYCRR 201-5.3(b): Contaminant List
- 36 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 37 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 38 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping. Permit Effective Date: 02/11/2002
Permit Expiration Date: No expiration date.



FEDERALLY ENFORCEABLE CONDITIONS

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

Condition 20: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 20.1:

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

Condition 3: Maintenance of equipment
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 3.1:

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

Condition 6: Recycling and Salvage
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 6.1:

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 6 NYCRR.

Condition 7: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 7.1:

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 9: Proof of Eligibility
Effective between the dates of 02/11/2002 and Permit Expiration Date



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

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

Item 9.1:

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

Condition 10: Proof of Eligibility

Effective between the dates of 02/11/2002 and Permit Expiration Date

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

Item 10.1:

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

Condition 16: Required emissions tests

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 16.1:

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

Condition 17: Visible emissions limited.

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 17.1:

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-



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

minute period per hour of not more than 57 percent opacity.

Condition 1: Sealing
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

(a) The commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the commissioner issued in the case of the violation. Sealing means labelling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

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

Condition 4: Unpermitted Emission Sources
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 4.1:

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

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



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

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

Condition 5: Emergency Defense
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 5.1:

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.

Condition 8: Public Access to Recordkeeping
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.10(a)

Item 8.1:

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Condition 11: Facility Permissible Emissions
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 11.1:

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: 000108-95-2 PTE: 19,800 pounds per year
Name: PHENOL

CAS No: 0NY100-00-0 PTE: 49,000 pounds per year
Name: HAP

CAS No: 0NY998-00-0 PTE: 99,000 pounds per year
Name: VOC

Condition 12: Compliance Demonstration
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Flexovit will maintain actual VOC emissions below 49.9 tons/yr, which is less than the Title V applicability threshold. Details for determining compliance is detailed in the condition for capping out of 6 NYCRR 212-10, Reasonable Available Control Technology for VOC's, which also has an applicability threshold of 50 tons per year.



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

Compliance with 212-10 will also demonstrate compliance with this condition.

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

Condition 13: Compliance Demonstration
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000078-93-3	METHYL ETHYL KETONE
CAS No: 000108-10-1	2-PENTANONE, 4-METHYL
CAS No: 000111-46-6	ETHANOL, 2,2'-OXYBIS-
CAS No: 000108-95-2	PHENOL

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Flexovit will maintain actual individual HAP emissions below 9.9 tons/yr. Phenol, the predominant HAP emission, will be monitored by maintaining a record keeping system that tracks actual emissions from the resin curing operations (process 001) and the coating operation (process 003). Records of resin used during the month, times the emission factor of 1.65 pounds of phenol released per 100 pound mix of resin will be used to calculate emissions. Compliance will be based on a 12 month rolling average not to exceed 9.9 tpy. If the ingredients of the mix or the parameters of the curing process changes then this emission factor must be verified by lab analysis or stack test. An annual compliance report shall be submitted to this office detailing each month's 12 month average.



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING
Parameter Monitored: PHENOL
Upper Permit Limit: 9.9 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Condition 14: Compliance Demonstration
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:
Flexovit will maintain actual aggregate HAP emissions below 24.9 tons/yr. This will be demonstrated through maintaining a record-keeping system that tracks actual aggregate HAP emissions from the resin curing operations (proc 001) & the polytex coating operation (proc 003). Actual aggregate HAP emissions from these processes will be capped below 24.51 tpy. This will ensure that facility-wide actual HAP emissions are maintained below 24.9 tpy, as the HAP PTE from all other sources does not exceed 0.39 tpy. Records of resin used times the percent of the specific HAP from material safety data sheets or equivalent plus HAP from coating material applied at processes 003 times the appropriate emission factor will be maintained to determine monthly emissions of individual HAP's. Compliance will be based on a 12 month rolling average. An annual compliance report containing individual month, 12 month rolling average, is to be submitted to this office.

New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012



Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: COATING
Parameter Monitored: HAP
Upper Permit Limit: 24.9 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Condition 15: Non Applicable requirements
Effective between the dates of 02/11/2002 and Permit Expiration Date

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

Item 15.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

40CFR 60-RR.441

Emission Unit: U00003

Reason: The affected facility to which the provisions of this subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials. Flexovit maintains and operates a lithographic printing press for the printing of labels that are applied to the grinding wheels. In the definition section of this regulation a "coating line" is defined as "any number or combination of adhesive, release, or precoat coating applicators, flashoff areas, and ovens which coat a continuous web, located between a web unwind station and a web rewind station, to produce pressure sensitive tape and label materials." This press does not apply a coating to a continuous web.

Condition 18: Facility Permissible Emissions
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.10

Item 18.1:

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



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

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

CAS No: 0NY998-00-0

PTE: 99,000 pounds per year

Name: VOC

Condition 19: Compliance Demonstration

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.10

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Flexovit will maintain actual VOC emissions below 49.9 tons/yr and "CAP" out of the requirements for Reasonable Available Control Technology (RACT) as specified in 6 NYCRR part 212-10. This condition will also effectively "CAP" the facility below the Title V and 6 NYCRR part 234 applicability threshold of 50 tons per year. This will be demonstrated through maintenance and a record keeping system that tracks actual VOC emissions from the resin curing operations (process 001) and the polytex coating operations (process 003). Actual VOC emissions from these processes will be capped below 43.04 tpy. This will ensure that facility-wide actual VOC emissions are maintained below 49.9 tpy, as the PTE from all other sources does not exceed 6.86 tpy. Emissions calculations will be based on a 12 month rolling average. An annual compliance report with the individual month, 12 month rolling average, shall be submitted to this office by the end of January each year.

Work Practice Type: PARAMETER OF PROCESS MATERIAL



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

Process Material: VOC's
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 43.04 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

**Condition 21: Equipment Specifications for Cold Cleaning Batch
Degreasing
Effective between the dates of 02/11/2002 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 226

Item 21.1:

A. Equipment specifications:

1. A cover shall be provided which can be operated easily.
2. The drainage facility shall be internal (under cover), if practical.
3. A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.7, or a water cover where the solvent is insoluble in and heavier than water, where the solvent being used has a vapor pressure greater than 33mm Hg at 38°C (100°F) or where the solvent is heated above 50°C (120°F)

B. Operating requirements:

1. Clean parts shall be drained at least 15 seconds or until dripping ceases.

C. General requirements:

No person shall conduct solvent metal cleaning unless:

1. Solvent is stored in covered containers and waste solvent is transferred or disposed of in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
2. Equipment used in solvent metal cleaning is maintained to minimize leaks and fugitive emissions.
3. Equipment used in solvent metal cleaning displays a conspicuous summary of proper operating procedures consistent with minimizing emissions of volatile organic compounds.
4. Equipment covers are closed when the solvent metal cleaning unit is not in service.
5. A record of solvent consumption shall be maintained for each year and made available to the commissioner or his representative upon request.

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



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

Condition 22: Compliance Demonstration

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Process: 001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

There are 17 natural gas fired ovens used to cure "green" grinding wheels. Emissions are Volatile Organic Compounds (VOC's), particulates and products of combustion. Particulate emissions are limited under 6 NYCRR part 212.4(a), table 2. Emissions of concern are condensible particulate matter and for this process assumed to have an Environmental Rating of "B" . The condensible Particulate matter is generated as the VOC's being emitted from the curing process condense at the outlet of the stack. No emissions data is available for this type of process. The total mass of gaseous and liquid particulates emitted per source is assumed to be minimal due to the fact that the majority of the phenol in the resin bonds in the curing process, and particulates are not generated by curing. The issue will be the opacity that may occur from the condensing plume. Under Table 2, degree of air cleaning required for an emission rate potential of up to 10 pounds per hour shall be specified by the commissioner. If opacity is significant a stack test will be required and the data used to determine the degree of air cleaning. Noncompliance with the permit condition for opacity of emissions limited under 6 NYCRR part 212.6 will be used to determine if a stack test is warranted. Proper operation of the ovens and monitoring of the amount of wheels (quantity of phenolic resin per charge) will aide in minimizing emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Condition 23: Compliance Demonstration
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001
Process: 001

Item 23.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Except as permitted by a specific part of Title 6 of the NYCRR, 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)

- 1) Observe each oven stack once per week for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).
- 2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:
 - weather condition
 - was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

- 3) If the operator observes any visible emissions (other than steam - see below), then a Method 9 analysis (based



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. 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. (This does not apply until after the first six month certification period for reasons discussed in the last paragraph below.) Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: epa method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Condition 24: Compliance Demonstration

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.10

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012



Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

(a) Open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or coating removal;

(b) Store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or coating removal;

(c) Use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere;

(d) Use open containers to store or dispense surface coatings and/or inks unless production, sampling, 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; or

(e) Use open containers to store or dispose of spent surface coatings, spent VOC's and/or solvents.

This describes good operating practice and records of the activity are not necessary. Employees must be made aware of these procedures.

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Condition 25: Compliance Demonstration

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.3

Item 25.1:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012



Emission Unit: U-00002

Process: 003

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This process utilizes an afterburner for control of VOC emissions and in accordance with 228.3(b) must meet an overall removal efficiency of 81 % . This assumes 90 % of the emitted VOC's are captured and delivered to the afterburner which converts 90 percent of the VOC's to carbon dioxide and water vapor. The control equipment shall operate on minimal auxiliary fuel and provide for maximum heat recovery.

A stack test is required to demonstrate compliance with the 81% overall removal efficiency using test methods from appendix A of 40 cfr 60. A stack test protocol must be submitted to this office for approval within 30 days of permit issuance. A Stack test must be performed within 30 days of department approval of the protocol and department staff given the opportunity to witness the test. A stack test report of results is to be submitted to this office within 30 days of completion of the test. Compliance will be based on the average of the three test runs.

Parameter Monitored: VOC's

Lower Permit Limit: 81 percent reduction by weight

Reference Test Method: USEPA method 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 26: Compliance Demonstration

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.4

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Process: 003

New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012



Item 26.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Except as permitted by a specific part of Title 6 of the NYCRR, 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)

1) Observe stack once per week for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. 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. (This does not apply until after the first six month certification period for reasons discussed in the last paragraph below.) Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

** NOTE ** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a

New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012



distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Condition 27: Compliance Demonstration
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.5(g)

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002

Process: 003

Item 27.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A monitor for measuring exhaust gas temperature of the afterburner must be installed, periodically calibrated, and operated at all times that the associated control equipment is operating. The minimum acceptable temperature for operation shall be determined during the stack test required under 6 NYCRR part 228.3. The lowest acceptable temperature measured during the three test runs will be used to establish the lower limit in this condition currently set at 1400 F. The temperature shall not fall below the stated value during operation of the coating line. A strip chart recorder of temperature will be maintained.

New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012



Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1400 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Condition 28: Compliance Demonstration
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.744(b), NSPS Subpart VVV

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002
Process: 003

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Standards of Performance for Polymeric Coating of Supporting Substrates facilities, 40 cfr 60. subpart VVV, applies to each coating operation and any on site coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates. This processes potential to emit of 69.19 tons per year is below the applicability level of 95 MG (104.7 tpy) per 12 month period. The only applicable requirement of this regulation is section 60.744(b) 60.747(b) and 60.747 (c). Section 60.744(b) requires the semiannual estimate of the projected annual amount of VOC to be used for the manufacture of polymeric coating and substrata at the affected coating operation in that year; and (2) Maintain records of actual VOC usage. Section 60.747(b) requires initial notification of anticipated start up, required under 60.7(a)(2) of the general Provisions, a material flow chart indicating projected VOC use. The owner or operator shall also submit actual VOC use records at the end of the initial year. This item has been satisfied with a letter from Flexovit

New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012



to the Administrator dated May 10, 2001.

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

Condition 29: Compliance Demonstration
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.747(c), NSPS Subpart VVV

Item 29.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00002
Process: 003

Item 29.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

This section of 40 cfr 60 subpart VVV requires:
(1) Maintain VOC records estimating semiannual projected
VOC use and actual 12 month VOC use;
(2) Report the first semiannual estimate in which
projected annual VOC use exceeds the applicable
cutoff;
(3) Report the first 12-month period in which the actual
VOC use exceeds the applicable cutoff.

Parameter Monitored: VOC's
Upper Permit Limit: 95 Megagrams (10**6 grams) per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 12 calendar month(s).

Condition 30: Compliance Demonstration
Effective between the dates of 02/11/2002 and Permit Expiration Date



Applicable Federal Requirement: 6NYCRR 234.1

Item 30.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00003

Process: 009

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 30.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Flexovit will maintain actual VOC emissions below 49.9 t/yr. The limit and requirements are the same as those listed under 6 NYCRR 201-6,(VOC cap out of title V permitting) and 212-10, (VOC cap out of RACT requirement). The condition under 212-10 has details for maintaining compliance. Noncompliance with the 43.04 tpy limit in 212-10 will also be considered noncompliance with part 201-6 and part 234 .

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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



STATE ONLY ENFORCEABLE CONDITIONS

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

Condition 31: Unavoidable noncompliance and violations
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 31.1:

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

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

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

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

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

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 32: General Provisions

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 32.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 32.2:

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.

Item 32.3:

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.

Condition 33: Permit Exclusion Provisions

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 33.1:

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 currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant 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 by the Department and the receipt thereof by the Applicant does not



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

supercede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements contained in such order or modification thereof unless specifically intended by this permit.

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 the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not addressed in this permit.

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 the right of the Department to pursue any claims for natural resource damages against the Applicant.

Condition 34: Emission Unit Definition
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 34.1:

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

Emission Unit: U-00001

Emission Unit Description:

This emission unit consists of mix equipment and curing ovens associated with the manufacture of grinding wheels for the abrasives industry. There are two processes identified, process 001 which is the curing of mechanically pressed grinding wheels and process 002 which is the mixing of the batch compositions. Process 1 consists of 17 curing ovens. process 2 is a station that applies epoxy resin to a roll for flap disk construction and includes a natural gas fired oven for curing. There also is a mixing station associated with this process that does not have a direct vent to the outdoors.

Building(s): 01

Item 34.2:

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

Emission Unit: U-00002

Emission Unit Description:

This emission unit consists of a coating machine and associated equipment. There is one process identified as 003 which is the coating of the fiberglass substrate using a polymer coating and a station that applies alcohol to



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

develop tacky ness for subsequent black paper application. A black ink line is also applied to the substrate by the coating machine. This process includes all ancillary equipment and operations associated with the coating machine.

Building(s): 02

Item 34.3:

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

Emission Unit: U-00003

Emission Unit Description:

This emission unit consists of miscellaneous support activities that occur at the Flexovit facility. There are six processes identified within the emission unit: 004- Aluminum plate cleaning using a mild caustic, 005- finishing (manual grinding and label application which is an exempt activity, 006- 20"x30"x24" Zinc die casting station, 007- Safety kleen degreasing station, 008-exempt molded rubber cleaning station by hand, and 009- Lithographic printing. Each of the non exempt operations are described in detail in the process description section of this application form.

Building(s): 01
02

Condition 35: Contaminant List

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5.3(b)

Item 35.1:

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

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

CAS No: 000111-46-6
Name: ETHANOL, 2,2'-OXYBIS-

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

CAS No: 000078-93-3
Name: METHYL ETHYL KETONE



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

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

CAS No: 000108-95-2
Name: PHENOL

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

Condition 36: Air pollution prohibited
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 36.1:

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

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

Condition 37: Emission Point Definition By Emission Unit
Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 37.1:

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

Emission Unit: U-00001

Emission Point: 0000A

Height (ft.): 37

Diameter (in.): 8

NYTMN (km.): 4729.6

NYTME (km.): 171.4

Building: 01

Emission Point: 0000B

Height (ft.): 37

Diameter (in.): 8

Building: 01

Emission Point: 0000C

Height (ft.): 37

Diameter (in.): 8



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

			Building: 01
Emission Point: 0000D			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000E			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000F			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000G			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000H			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000I			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000J			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000K			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000L			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000M			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000N			
Height (ft.): 37	Diameter (in.): 8		Building: 01
Emission Point: 0000O			



New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012

Height (ft.): 37

Diameter (in.): 8

Building: 01

Emission Point: 0000P

Height (ft.): 37

Diameter (in.): 8

Building: 01

Item 37.2:

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

Emission Unit: U-00002

Emission Point: 80001

Height (ft.): 32

Diameter (in.): 24

Building: 02

Item 37.3:

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

Emission Unit: U-00003

Emission Point: 00001

Height (ft.): 42

Diameter (in.): 10

Building: 01

Emission Point: 00002

Height (ft.): 24

Length (in.): 18

Width (in.): 24

Building: 02

Emission Point: 00003

Height (ft.): 14

Diameter (in.): 6

Building: 02

Condition 38: Process Definition By Emission Unit

Effective between the dates of 02/11/2002 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 38.1:

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

Emission Unit: U-00001

Process: 001

Source Classification Code: 3-05-036-05

Process Description:

This process is the curing of "green" grinding wheels in natural gas fired ovens. The "green" grinding wheels are mechanically presses into shape prior to being fired in

New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012



the curing ovens. This is approximately a 12 hour oven cycle with temperatures reaching 360 F. A temperature strip chart recorder is maintained on each oven.

Emission Source/Control: S0001 - Process

Emission Source/Control: S0002 - Process

Emission Source/Control: S0003 - Process

Emission Source/Control: S0004 - Process

Emission Source/Control: S0005 - Process

Emission Source/Control: S0006 - Process

Emission Source/Control: S0007 - Process

Emission Source/Control: S0008 - Process

Emission Source/Control: S0009 - Process

Emission Source/Control: S0010 - Process

Emission Source/Control: S0011 - Process

Emission Source/Control: S0012 - Process

Emission Source/Control: S0013 - Process

Emission Source/Control: S0014 - Process

Emission Source/Control: S0015 - Process

Emission Source/Control: S0016 - Process

Item 38.2:

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

Emission Unit: U-00001

Process: 002

Source Classification Code: 3-05-036-01

Process Description:

This process is the construction of a flap disk sanding roll. Epoxy resin applied to a roll is used to attach stripes of sanding paper. The epoxy resin is cured in a natural gas fired oven similar to that used for curing the green grinding wheels. Temperature is maintained around

New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012



300 F and includes a strip chart recorder.

Emission Source/Control: S0017 - Process

Item 38.3:

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

Emission Unit: U-00002

Process: 003

Source Classification Code: 4-02-001-01

Process Description:

Four activities occur at this process or coating line as follows: The coating of a fiberglass substrate using a polymer coating; Drying oven; Alcohol application station for the purpose of making the cured web tacky for subsequent application of black paper; Application of a black ink line to the substrate. This process includes all ancillary equipment and operations associated with the coating machine.

Emission Source/Control: S0018 - Process

Item 38.4:

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

Emission Unit: U-00003

Process: 006

Source Classification Code: 3-04-008-73

Process Description:

This process includes zinc die cast operations where zinc is heated to a molten state and then cast into the requisite form. The equipment is made by National die cast, the bath is approximately 20"x30"x24", only clean ingots of zinc are used, an small fume hood is also used.

Emission Source/Control: S0022 - Process

Item 38.5:

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

Emission Unit: U-00003

Process: 007

Source Classification Code: 4-01-003-06

Process Description:

This process is degreasing of parts in safety-kleen cold cleaning batch degreasers. These would be exempt from permitting pursuant to 6 nycrr part 201-3, provided they did not have an applicable requirement. However most parts washers have an applicable requirement pursuant to 6 nycrr part 226 and therefore these have been included

New York State Department of Environmental Conservation

Permit ID: 9-1444-00012/00021

Facility DEC ID: 9144400012



within this permit application.

Emission Source/Control: S0023 - Process

Item 38.6:

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

Emission Unit: U-00003

Process: 009

Source Classification Code: 4-05-004-01

Process Description:

This process is the printing of labels for grinding wheels on a lithographic print press. Graphic arts development activities also occur in support of the lithographic printing plate preparation.

Emission Source/Control: S0025 - Process

Emission Source/Control: S0026 - Process