



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-1452-00284/00001  
Mod 0 Effective Date: 03/11/2008 Expiration Date: 03/10/2018  
Mod 1 Effective Date: 12/24/2013 Expiration Date: 03/10/2018  
Mod 2 Effective Date: 09/08/2015 Expiration Date: 03/10/2018

Permit Issued To: MOLDTECH INC  
1900 COMMERCE PKWY  
LANCASTER, NY 14086

Contact: ROB PALADICHUK  
MOLDTECH INC  
1900 COMMERCE PARKWAY  
LANCASTER, NY 14086  
(716) 685-3344

Facility: MOLDTECH INC  
1900 COMMERCE PKWY  
LANCASTER, NY 14086

Description:  
Moldtech, Inc. produces a variety of innovative custom rubber molded products for the automotive, medical, military, agricultural, electronics, and pharmaceutical industries. Manufacture of these products involves compression, transfer and injection molding processes, all of which are self-contained. Products are washed in a soap solution, then sand blasted to prepare the surface for coating. The sand blasting operation is self-contained. The three emission points are paint spray booths where adhesive primers are applied to facilitate the bonding of rubber to metal or plastic. Each booth is controlled with fiberglass filter pads. Also on site is a post curing oven which is used approximately once a week for a period of 2-4 hours. This oven is classed as a NFPA 86 Class B oven which operates at approximately atmospheric pressure where there are no flammable volatiles or combustible materials being heated.

This permit modification establishes a lesser degree of control per Part 228-2.4(e) for four specific adhesives/adhesive primers used at Moldtech Inc. Moldtech submitted a detailed process-specific Reasonably Available Control Technology (RACT) analysis dated August 2014 (and revised June 2015) which



was completed in accordance with the “NYSDEC DAR-20 Economic and Technical Analysis for Reasonably Available Control Technology (RACT)” policy and 6NYCRR Part 228-2.4(e). The RACT analysis successfully demonstrated the technical and economic infeasibility of controlling VOC emissions from four specific adhesives/adhesive primers. To maintain compliance with the process-specific volatile organic compound (VOC) RACT requirements, the facility shall limit VOC emissions from non-complaint adhesives/adhesive primers to less than 11.3 tons per year on a rolling twelve month basis, which represents the maximum emission rate of the four non-compliant adhesives/adhesive primers based on the 3600 gallons per year usage factor used in the economic feasibility analysis.

Moldtech will limit emissions for purposes of capping out of the major facility applicability requirements of 6NYCRR Part 201-6. Specifically, actual emissions of volatile organic compound (VOC) emissions will be less than 49.5 tons per year, total hazardous air pollutants (HAPs) are limited to less than 24.5 tons per year, and each individual HAP is limited to less than 9.5 tons per year.

Moldtech is required to annually certify continuous compliance with the emission limits established in this permit through use of a 12-month rolling total emission rate calculated on a monthly basis.

Moldtech is also subject to the VOC content limits for coatings and adhesives per 6NYCRR SubParts 228-1 and 228-2.

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: **LISA M CZECHOWICZ**  
**NYSDEC - REGION 9**  
**270 MICHIGAN AVE**  
**BUFFALO, NY 14203-2915**



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



**Notification of Other State Permittee Obligations**

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

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

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

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

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

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
  - Applications for permit renewals, modifications and transfers
  - Permit modifications, suspensions or revocations by the Department
  - Permit modifications, suspensions or revocations by the Department

**Facility Level**

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
- Submission of application 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, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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



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

**Item 4.1:**

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

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

**Condition 1-1: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 1-1.1:**

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

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

\*\*\*\* Facility Level \*\*\*\*

**Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 9145200284**



270 Michigan Avenue  
Buffalo, NY 14203-2999  
(716) 851-7165

**Condition 1-2: Submission of application for permit modification or  
renewal-REGION 9**

**HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 1-2.1:**

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 14203-2915  
(716) 851-7165

**New York State Department of Environmental Conservation**

Permit ID: 9-1452-00284/00001

Facility DEC ID: 9145200284



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: MOLDTECH INC  
1900 COMMERCE PKWY  
LANCASTER, NY 14086

Facility: MOLDTECH INC  
1900 COMMERCE PKWY  
LANCASTER, NY 14086

Authorized Activity By Standard Industrial Classification Code:  
3061 - MECHANICAL RUBBER GOODS

Mod 0 Permit Effective Date: 03/11/2008

Permit Expiration Date: 03/10/2018

Mod 1 Permit Effective Date: 12/24/2013

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Mod 2 Permit Effective Date: 09/08/2015

Permit Expiration Date: 03/10/2018



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR Part 215: Open Fires Prohibited at Industrial and Commercial Sites
- 1-1 6 NYCRR 201-1.7: Recycling and Salvage
- 2 6 NYCRR 201-1.7: Recycling and Salvage
- 3 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 1-2 6 NYCRR 201-7.1: Facility Permissible Emissions
- \*1-3 6 NYCRR 201-7.1: Capping Monitoring Condition
- \*1-4 6 NYCRR 201-7.1: Capping Monitoring Condition
- \*1-5 6 NYCRR 201-7.1: Capping Monitoring Condition
- 1-6 6 NYCRR 211.1: Air pollution prohibited
- 1-7 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
- 1-8 6 NYCRR 228-1.4 (b): Compliance Demonstration
- 1-9 6 NYCRR 228-2.4 (a): Compliance Demonstration
- 2-1 6 NYCRR 228-2.4 (e): Compliance Demonstration

#### Emission Unit Level

##### EU=A-00001

- 1-17 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 1-10 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 1-11 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 1-12 6 NYCRR 228-1.3 (e): Surface Coating- application requirements
- 1-13 6 NYCRR 228-2.4 (b) (3): Compliance Demonstration
- 1-14 6 NYCRR 228-2.4 (b) (4): Compliance Demonstration
- 1-15 6 NYCRR 228-2.4 (d): Compliance Demonstration
- 1-16 6 NYCRR 228-2.5 (a): Compliance Demonstration

##### EU=A-00001,Proc=001

- 8 6 NYCRR 212.4 (c): Compliance Demonstration
- 9 6 NYCRR 212.4 (c): Compliance Demonstration
- 10 6 NYCRR 212.6 (a): Compliance Demonstration

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 11 ECL 19-0301: Contaminant List
- 1-18 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 12 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 13 6 NYCRR Subpart 201-5: Emission Unit Definition
- 1-19 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 1-20 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 14 6 NYCRR 211.2: Air pollution prohibited
- 1-21 6 NYCRR 211.2: Visible Emissions Limited

#### Emission Unit Level

- 15 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 16 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



NOTE: \* preceding the condition number indicates capping.



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

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

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

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



required to operate such device effectively.

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

**Item 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.

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

**Condition 1: Open Fires Prohibited at Industrial and Commercial Sites**



Effective between the dates of 03/11/2008 and 03/10/2018

Applicable Federal Requirement:6 NYCRR Part 215

**Item 1.1:**

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.

**Condition 1-1: Recycling and Salvage**

Effective between the dates of 12/24/2013 and 03/10/2018

Applicable Federal Requirement:6 NYCRR 201-1.7

**Item 1-1.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 2: Recycling and Salvage**

Effective between the dates of 03/11/2008 and 03/10/2018

Applicable Federal Requirement:6 NYCRR 201-1.7

**Item 2.1:**

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 3: Prohibition of Reintroduction of Collected Contaminants to the air**

Effective between the dates of 03/11/2008 and 03/10/2018

Applicable Federal Requirement:6 NYCRR 201-1.8

**Item 3.1:**

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 1-2: Facility Permissible Emissions**

Effective between the dates of 12/24/2013 and 03/10/2018

Applicable Federal Requirement:6 NYCRR 201-7.1

**Item 2-2.1:**

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 (From Mod 2) PTE: 99,000 pounds  
per year

Name: VOC



**Condition 1-3: Capping Monitoring Condition**  
Effective between the dates of 12/24/2013 and 03/10/2018

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 1-3.1:**

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:

6 NYCRR 201-6.1 (a)

**Item 1-3.2:**

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

**Item 1-3.3:**

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 1-3.4:**

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 1-3.5:**

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 1-3.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

|                     |                        |
|---------------------|------------------------|
| CAS No: 000067-56-1 | METHYL ALCOHOL         |
| CAS No: 000108-10-1 | 2-PENTANONE, 4-METHYL  |
| CAS No: 001330-20-7 | XYLENE, M, O & P MIXT. |
| CAS No: 000108-88-3 | TOLUENE                |

**Item 1-3.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC



### OPERATIONS

#### Monitoring Description:

The facility will limit actual emissions of four specific Hazardous Air Pollutants (HAPs). The actual emissions of toluene, xylene, methyl alcohol, and 2-pentanone 4-methyl will be limited to less than 9.5 tons per contaminant per year for purposes of capping out of the major facility applicability requirements of 6NYCRR Part 201-6.

Actual emissions shall be calculated based on the usage of coatings, adhesives, solvents, and other products and the specific HAP content of the products. The general accuracy of the emission calculations shall be verified by maintaining pertinent records including, but not limited to: purchase and/or production records and HAP content of products. All records with corresponding emission calculations shall be kept on-site for a minimum of five years. This information shall be made available to the Department on request.

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

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 19000 pounds 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 1/30/2014.

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

**Condition 1-4: Capping Monitoring Condition**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable Federal Requirement:6 NYCRR 201-7.1**

#### **Item 1-4.1:**

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:

6 NYCRR 201-6.1 (a)

#### **Item 1-4.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission



limits, terms, conditions and standards in this permit.

**Item 1-4.3:**

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 1-4.4:**

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 1-4.5:**

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 1-4.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility will limit actual Hazardous Air Pollutant (HAP) emissions to less than 24.5 tons per year for purposes of capping out of the major facility applicability requirements of 6NYCRR Part 201-6.

Actual HAP emissions shall be calculated based on the usage of coatings, adhesives, solvents, and other HAP containing products and the HAP content of the products. The general accuracy of the emission calculations shall be verified by maintaining pertinent records including, but not limited to: purchase and/or production records and HAP content of products. All records with corresponding emission calculations shall be kept on-site for a minimum of five years. This information shall be made available to the Department on request.

**New York State Department of Environmental Conservation**

Permit ID: 9-1452-00284/00001

Facility DEC ID: 9145200284



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

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 49000 pounds 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 1/30/2014.

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

**Condition 1-5: Capping Monitoring Condition**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable Federal Requirement:6 NYCRR 201-7.1**

**Item 1-5.1:**

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:

6 NYCRR 201-6.1 (a) (1)

**Item 1-5.2:**

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

**Item 1-5.3:**

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 1-5.4:**

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 1-5.5:**

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

**New York State Department of Environmental Conservation**

Permit ID: 9-1452-00284/00001

Facility DEC ID: 9145200284



the Act.

**Item 1-5.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0      VOC

**Item 1-5.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility will limit actual VOC emissions to less than 49.5 tons per year for purposes of capping out of the major facility applicability requirements of 6NYCRR Part 201-6.

Actual VOC emissions shall be calculated based on the usage of coatings, adhesives, solvents, and other VOC containing products and the VOC content of the products. The general accuracy of the emission calculations shall be verified by maintaining pertinent records including, but not limited to: purchase and/or production records and VOC content of products. All records with corresponding emission calculations shall be kept on-site for a minimum of five years. This information shall be made available to the Department on request.

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

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: COATING

Upper Permit Limit: 99000 pounds 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 1/30/2014.

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

**Condition 1-6:      Air pollution prohibited**

**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable Federal Requirement:6 NYCRR 211.1**



**Item 1-6.1:**

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 1-7: Surface Coating- Prohibitions**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable Federal Requirement:6 NYCRR 228-1.3 (c)**

**Item 1-7.1:**

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

**Condition 1-8: Compliance Demonstration**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable Federal Requirement:6 NYCRR 228-1.4 (b)**

**Item 1-8.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 1-8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility performing a Class B coating process shall not operate unless the strategies to control VOC emissions as



defined in Subdivision 228-1.4(b) for the various types of Class B coating lines are used unless the appropriate emission control requirements of Section 228-1.5 of this Part have been met or a process specific RACT variance has been granted in accordance with Subdivision 228-1.5(e) of this Part. The VOC content limits for Class B coating lines can be met by averaging the VOC content of the materials used on a single surface coating unit each day ('i.e.', daily within- coating unit averaging).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-9: Compliance Demonstration**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable Federal Requirement:6 NYCRR 228-2.4 (a)**

**Item 1-9.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 1-9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

When a facility uses a commercial or industrial adhesive, sealant, adhesive primer or sealant primer, the concentration of the volatile organic compounds (VOC) shall not exceed the VOC content limits specified in Table 1 of 6 NYCRR Part 228-2.4. For adhesives applied to the listed substrates in Table 1, the respective VOC content limits apply as follows:

(1) when an adhesive or sealant is subject to a specific VOC content limit in Table 1, the specific limit is applicable rather than an adhesive-to-listed-substrate limit; and

(2) if an adhesive is used to bond dissimilar substrates together, the applicable substrates category with the highest VOC content shall be the limit for such use.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-1: Compliance Demonstration**  
**Effective between the dates of 09/08/2015 and 03/10/2018**

**Applicable Federal Requirement:6 NYCRR 228-2.4 (e)**



**Item 2-1.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 2-1.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A lesser degree of control has been established per Part 228-2.4(e) for four specific adhesives/adhesive primers used at Moldtech Inc. Moldtech submitted a detailed process-specific Reasonably Available Control Technology (RACT) analysis dated August 2014 (and revised June 2015) which was completed in accordance with the "NYSDEC DAR-20 Economic and Technical Analysis for Reasonably Available Control Technology (RACT)" policy and 6NYCRR Part 228-2.4(e). The RACT analysis successfully demonstrated the technical and economic infeasibility of controlling VOC emissions from four specific adhesives/adhesive primers via 1.) utilizing complaint coatings, 2.) utilizing demonstrated and proven control technology including regenerative thermal oxidation, 3.) utilizing demonstrated and proven production modification methods. The highest recent material usage was identified and a 50% increase was applied to account for potential increase in demand. The economic feasibility analysis for thermal oxidation, using this increased and therefore more conservative usage factor, showed a cost of control of approximately \$12,000 per ton which is more than twice the cost feasibility threshold.

To maintain compliance with the process-specific volatile organic compound (VOC) RACT requirements, the facility shall limit VOC emissions from four specific non-complaint adhesives/adhesive primers to less than 11.3 tons per year on a rolling twelve month basis. The emission limit represents the maximum emission rate of the four non-compliant adhesives/adhesive primers based on the 3600 gallons per year usage factor used in the economic feasibility analysis.

Emissions subject to this RACT requirement shall be calculated using a combination of material usage and production records of material processed by the equipment. Records of all the compliance demonstration procedures and data required by this condition shall be retained on site for five years and made available to the Department upon



request.

Moldtech, Inc. will continue to assess the feasibility of using alternative low-VOC substitute adhesives and adhesive primers.

The RACT determination shall be re-evaluated every five years, or prior to any changes that could significantly impact the existing approved RACT evaluation. The first re-evaluation will be due no later than five years from the date of issue of this permit modification.

Parameter Monitored: VOC

Upper Permit Limit: 11.3 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 1/30/2016.

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

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

**Condition 1-17: Compliance Demonstration**

**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable Federal Requirement:6 NYCRR 228-1.3 (a)**

**Item 1-17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

**Item 1-17.2:**

Compliance Demonstration 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. Compliance will be determined by conducting a Method 9 opacity evaluation at a minimum frequency of once per year, while the source is in normal operating mode.

In addition to the above opacity evaluation, the permittee will conduct daily observations of visible emissions from



the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

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:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Incident weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

**\*\* 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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)



Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-10: Compliance Demonstration**  
Effective between the dates of 12/24/2013 and 03/10/2018

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

**Item 1-10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

**Item 1-10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-11: Surface Coating - Handling, storage and disposal**



Effective between the dates of 12/24/2013 and 03/10/2018

Applicable Federal Requirement:6 NYCRR 228-1.3 (d)

**Item 1-11.1:**

This Condition applies to Emission Unit: A-00001

**Item 1-11.2:**

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

- (1) 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;
- (2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
  - (i) an enclosed spray gun cleaning system that is kept closed when not in use;
  - (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
  - (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
  - (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

**Condition 1-12: Surface Coating- application requirements**

Effective between the dates of 12/24/2013 and 03/10/2018

Applicable Federal Requirement:6 NYCRR 228-1.3 (e)

**Item 1-12.1:**



This Condition applies to Emission Unit: A-00001

**Item 1-12.2:**

Facilities operating coating lines must use one or more of the following application techniques to apply the coating:

- (i) flow/curtain coating;
- (ii) dip coating;
- (iii) cotton-tipped swab application;
- (iv) electro-deposition coating;
- (v) high volume low pressure spraying;
- (vi) electrostatic spray;
- (vii) airless spray, (including air assisted);
- (viii) airbrush application methods for stenciling, lettering, and other identification markings; or
- (ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

**Condition 1-13: Compliance Demonstration**

Effective between the dates of 12/24/2013 and 03/10/2018

Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (3)

**Item 1-13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-13.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The composite vapor pressure of all cleanup solvents used at the facility shall be less than 45 mm Hg at 20 degrees Celsius.



Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: SOLVENT  
Parameter Monitored: COMPOSITE VAPOR PRESSURE  
Upper Permit Limit: 45 millimeters of mercury  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-14: Compliance Demonstration**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (4)**

**Item 1-14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

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

**Item 1-14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

When performing the removal of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment, the facility owner or operator must:

1. use an enclosed cleaning system, or an equivalent cleaning system as determined by the applicable test method identified in 6 NYCRR Part 228-2.6(h);
2. use a solvent with a VOC content less than or equal to 70 grams per liter; and
3. soak all parts containing dried adhesive in a solvent with a composite vapor pressure, excluding water and exempt compounds, less than or equal to 9.5 mm Hg at 20 degrees Celsius. The solvent and any soaking parts must be kept in a closed container at all times except when adding or removing parts from the container.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: SOLVENT  
Parameter Monitored: VOC CONTENT  
Upper Permit Limit: 70 grams per liter  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



DESCRIPTION  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-15: Compliance Demonstration**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable Federal Requirement: 6 NYCRR 228-2.4 (d)**

**Item 1-15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Work practices shall be employed at facilities where the total actual VOC emissions from all industrial adhesive application processes, including related cleaning activities, equal or exceed three tons in a 12-month rolling period, before consideration of emission control equipment. Work practices shall include:

(1) the following types of application equipment, with the use of low-VOC adhesives or adhesive primers: electrostatic spray; HVLP spray; flow coat; roll coat or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application; dip coat (including electrodeposition); airless spray; air-assisted airless spray; any other adhesive application method, subject to Department approval, capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spraying;

(2) the following work practices for storage, mixing operations, and handling operations for adhesives, thinners, and adhesive-related waste materials that:

(i) store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers;

(ii) ensure that mixing and storage containers used for



VOC-containing adhesives, adhesive primers, and process related waste materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing adhesives, adhesive primers, and process related waste materials; and

(iv) convey VOC-containing adhesives, adhesive primers, and process related waste materials from one location to another in closed containers or pipes.

(3) the following work practices to reduce VOC emissions from cleaning materials used in industrial adhesive application processes that:

(i) store all VOC-containing cleaning materials and used shop towels in closed containers;

(ii) ensure that storage containers used for VOC-containing materials are kept closed at all times except when depositing or removing these materials;

(iii) minimize spills of VOC-containing cleaning materials;

(iv) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

(v) minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-16: Compliance Demonstration**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable Federal Requirement: 6 NYCRR 228-2.5 (a)**

**Item 1-16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

New York State Department of Environmental Conservation

Permit ID: 9-1452-00284/00001

Facility DEC ID: 9145200284



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

**Item 1-16.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities using products subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) shall maintain records demonstrating compliance with the VOC content limits, including, but not limited to, the following information:

- (1) a list of each commercial and industrial adhesive, sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at the facility;
- (2) identification of each product by product name and description;
- (3) the VOC content of each product as supplied;
- (4) the mix ratio of any catalysts, reducers or other components used;
- (5) the final VOC content or vapor pressure, as applied; and
- (6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used at the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 03/11/2008 and 03/10/2018**

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

**Item 8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001  
Process: 001



**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

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

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

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Monitoring Frequency: WEEKLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 03/11/2008 and 03/10/2018**



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

**Item 9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001  
Process: 001

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

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operators of all paint spray booths must periodically monitor the booths and the accompanying particulate control device(s) by completing the following tasks on a weekly basis:

- Inspect the spray booth emission point for evidence of paint fallout and for presence of visible emissions. Presence of visible emissions indicates that the emission sources may not be operating properly and may need servicing.
- Inspect the spray booth's particulate control device for evidence that maintenance or replacement is needed.
- Record in an inspection log, which shall be made available for Department review upon request, the following information: Date, time, name of staff person performing inspection, and inspection results for each inspection; and, whenever a problem is discovered, a description of the problem, cause and corrective action taken.

Regardless of when a problem is noted, i.e., at a time other than during the weekly inspection, it must be immediately remedied.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 03/11/2008 and 03/10/2018**

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

**Item 10.1:**

The Compliance Demonstration activity will be performed for:



Emission Unit: A-00001

Process: 001

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

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

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

Monitoring Frequency: WEEKLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**



**Condition 11: Contaminant List**  
**Effective between the dates of 03/11/2008 and 03/10/2018**

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

**Item 11.1:**

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

CAS No: 000067-56-1  
Name: METHYL ALCOHOL

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

CAS No: 000108-88-3  
Name: TOLUENE

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

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

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

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

**Condition 1-18: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

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

**Item 1-18.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, 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 department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or



operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 12: Unavoidable noncompliance and violations**  
**Effective between the dates of 03/11/2008 and 03/10/2018**

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

**Item 12.1:**

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

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

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after



becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

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

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

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

**Condition 13: Emission Unit Definition**  
**Effective between the dates of 03/11/2008 and 03/10/2018**

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

**Item 13.1(From Mod 1):**

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

Emission Unit: A-00001

Emission Unit Description:

Three spray paint booths with filter exhaust.

Building(s): 1

**Condition 1-19: Renewal deadlines for state facility permits**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable State Requirement:6 NYCRR 201-5.2 (c)**

**Item 1-19.1:**

The owner or operator of a facility having an issued state facility 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.

**Condition 1-20: Compliance Demonstration**  
**Effective between the dates of 12/24/2013 and 03/10/2018**



**Applicable State Requirement:6 NYCRR 201-5.3 (c)**

**Item 1-20.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 1-20.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 9  
270 Michigan Ave.  
Buffalo, NY 14203

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 14: Air pollution prohibited**  
**Effective between the dates of 03/11/2008 and 03/10/2018**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 14.1:**

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 1-21: Visible Emissions Limited**  
**Effective between the dates of 12/24/2013 and 03/10/2018**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 1-21.1:**

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.

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

**Condition 15: Emission Point Definition By Emission Unit**  
**Effective between the dates of 03/11/2008 and 03/10/2018**



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

**Item 15.1(From Mod 1):**

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

Emission Unit: A-00001

Emission Point: 00001

Height (ft.): 30

Diameter (in.): 18

NYTMN (km.): 4757.5

NYTME (km.): 200.5

Emission Point: 00002

Height (ft.): 30

Diameter (in.): 18

NYTMN (km.): 4757.5

NYTME (km.): 200.5

Emission Point: 00003

Height (ft.): 30

Diameter (in.): 18

NYTMN (km.): 4757.5

NYTME (km.): 200.5

**Condition 16: Process Definition By Emission Unit**

**Effective between the dates of 03/11/2008 and 03/10/2018**

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

**Item 16.1(From Mod 1):**

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

Emission Unit: A-00001

Process: 001

Emission Source/Control: SPC01 - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: SPC02 - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: SPC03 - Control

Control Type: FIBERGLASS FILTER

Emission Source/Control: SPB01 - Process

Emission Source/Control: SPB02 - Process

Emission Source/Control: SPB03 - Process

