New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 1-4728-01128/00009
Renewal Number: 1
07/08/2010

Facility Identification Data
Name: MASON INDUSTRIES PROPERTY
Address: 350 RABRO DR
HAUPPAUGE, NY 11788

Owner/Firm
Name: MASON INDUSTRIES INC
Address: 350 RABRO DR
HAUPPAUGE, NY 11788, USA
Owner Classification: Corporation/Partnership

Permit Contacts
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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
This action is the renewal of the facility's Title V air permit. Facility operations, emission units, sources, emission points and controls remain unchanged. The facility performs surface coating operations on miscellaneous metal parts using coatings that contain Hazardous Air Pollutants (HAPs) and is subject to

40 CFR 63 Subpart MMMM: Surface Coating of Miscellaneous Metal Parts. The facility will meet the emission rate without add-on controls compliance option with their coating operations. Mason Industries remains subject to 6 NYCRR Part 228 as per Subpart 228.1.

Attainment Status
MASON INDUSTRIES PROPERTY is located in the town of ISLIP in the county of SUFFOLK.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:
Mason Industries cuts, welds and shapes steel frame units of varying sizes and shapes to hold rubber sheeting. The sheeting is wrapped around the frames in various configurations to create vibration dampening devices. The rubber for these products is made on site. Rubber production includes milling and calendering operations (Emission Unit 0-00002). The facility also operates a surface coating line which includes spray and dipping booths for the surface coating of miscellaneous metal parts (Emission Unit 0-00001).

Emission unit 0-00001 and the associated processes P01 and P03 are exempt from the requirements of 6NYCRR Part 212 as per 212.7(l). Volatile Organic Compound emissions are regulated by 6NYCRR Part 228 and are not given an "A" rating.

Permit Structure and Description of Operations
The Title V permit for MASON INDUSTRIES PROPERTY
is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning

device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:
combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

MASON INDUSTRIES PROPERTY is defined by the following emission unit(s):

Emission unit 000001 - Emission Unit 0-00001 consists of surface coating operations including a spray booth, paint storage area and dip booths. The spray and dip booths are used to apply various coatings to miscellaneous metal parts as part of the facility's manufacturing activities.

The paint storage area is equipped with floor sweeps and is exempt from permitting requirements pursuant to 6NYCRR Part 201-3.2(c)(42) provided coatings and paints are stored in closed containers at all times they are not in use.

Emission unit 000001 is associated with the following emission points (EP):
10001, 10004, 10005, 10011
Process: P01 is located at 1st Floor, Building M - Process P01 consists of a paint spray booth used in the surface coating of miscellaneous metal parts. The spray booth is exhausted by two 30" general exhaust fans that combine into a 30" exhaust duct which serves as the emission point. Applied lacquer/paint contains approximately 40% solids and is applied with approximately 25% overspray. The booth is equipped with triple baffles that trap approximately 95% of coating solids.
Process: P03 is located at 1st Floor, Building M - Process P03 consists of dip booths used for the surface coating of miscellaneous metal parts. Small steel parts are dipped in paint and allowed to hang over the paint trough and drip dry. Canopy enclosures over the drip areas collect the air that is vented out.

Emission unit 000002 - Emission Unit 0-00002 is a rubber production and product fabrication area consisting of a 36" mill, 60" mill, calenders, a bias cutter, and 3 autoclaves. Rubber is produced on site and used as part of the facility's final products.

Autoclave steam emissions are exempt from permitting requirements pursuant to 6NYCRR Part 201-3.3(c)(94).

Emission unit 000002 is associated with the following emission points (EP):
20007, 20008
Process: P02 is located at 1st Floor, Building M - Process P02 is the rubber production process consisting of pug milling rubber components: carbon black, magnesium oxide and clay. The resulting rubber is fed through calenders to create sheeting. Sheets are laid one upon the other against the bias to create thicker and stronger sheets which are cut to client specifications and applied to steel frames to create the final product. Emissions from the pug mills are vented to the outside. Solvent is hand applied to the mandrill to prepare it for rubber removal once the product has been created.

The manual application of solvents is a trivial process pursuant to 6 NYCRR Part 201-3.3(c)(53) and is exempt pursuant to 6 NYCRR Part 228.1(c)(6).

Title V/Major Source Status

MASON INDUSTRIES PROPERTY is subject to Title V requirements. This determination is based on the following information:
Mason Industries is a major source of emissions of Volatile Organic Compounds (VOC). The facility is subject to Title V requirements because they have opted not to cap emissions below major source thresholds.

The Facility has a PTE range of the following for each compound, all of which exceed major source thresholds:

For VOC: 50 TPY >= PTE < 100 TPY;

Program Applicability
The following chart summarizes the applicability of MASON INDUSTRIES PROPERTY with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS)
for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA)
which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to
be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements.

SIC Codes
SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis
of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3069	FABRICATED RUBBER PRODUCTS, NEC

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents
a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-08-006-99	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - OTHER FABRICATED PLASTICS Other Not Classified
4-02-009-98	SURFACE COATING OPERATIONS THINNING SOLVENTS - GENERAL General: Specify in Comments

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE lbs/yr	PTE Range
000108-10-1	2-PENTANONE, 4-METHYL		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		> 0 but < 2.5 tpy
000100-41-4	ETHYLBENZENE		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE		> 0 but < 10 tpy
0NY100-00-0	HAP	49000	
000110-54-3	HEXANE		> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES		> 0 but < 2.5 tpy
0NY075-00-5	PM-10		> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy
000108-88-3	TOLUENE		>= 10 tpy
0NY998-00-0	VOC		>= 50 tpy but < 100 tpy
001330-20-7	XYLENE, M, O & P MIXT.		> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.5(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

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

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

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

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

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

Item L: Permit Exclusion - ECL 19-0305

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

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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	38	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	39	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 26, 29, 30	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	14	General conditions

FACILITY	6NYCRR 201-6.5(a)(7)	2	General conditions Fees
FACILITY	6NYCRR 201-6.5(a)(8)	15	General conditions
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	16	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	23	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-6.5(g)	24	Permit shield
FACILITY	6NYCRR 201-7.2	25, 26	Emissions capping using synthetic minor permits
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	6	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	7	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	40	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	19	General Prohibitions - visible emissions limited
0-00002	6NYCRR 212.4(a)	35	General Process Emission Sources - emissions from new sources and/or modifications
0-00002	6NYCRR 212.4(c)	36	General Process Emission Sources - emissions from new processes and/or modifications
0-00002	6NYCRR 212.6(a)	37	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	8	Open Fires - Prohibitions
FACILITY	6NYCRR 228.1(d)	27	Will remain subject
0-00001	6NYCRR 228.3(a)	31	Recordkeeping, reports for VOCs
0-00001	6NYCRR 228.4	32	Opacity
0-00001	6NYCRR 228.5(a)	33	VOC recordkeeping by the facility
0-00001/-/P01	6NYCRR 228.5(a)	34	VOC recordkeeping by the facility
FACILITY	6NYCRR 228.6(a)	28	Prohibition of Sale

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department

the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.5 (a) (4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.5 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.5 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.5 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.5 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.5 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.5 (d) (5)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.5 (e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.5 (f) (6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of

the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 201-6.5 (g)
Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6 NYCRR 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5
This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2
This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR 211.3
This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

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.

40 CFR Part 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, MASON INDUSTRIES PROPERTY has been determined to be subject to the following regulations:

6 NYCRR 201-7.2
Title V or other applicable requirements using federally enforceable permit conditions permit.

6 NYCRR 212.4 (a)
This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources. This regulation applies to the rubber production process used at Mason Industries which is not regulated by the Part 63 NESHAP.

6 NYCRR 212.4 (c)
This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5, "Processes for which the Permissible Emission Rate is Based on Process Weight", to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot. This regulation applies to the rubber production process used at Mason Industries which is not regulated by the Part 63 NESHAP.

6 NYCRR 212.6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all emission sources. It applies to all process sources subject to Part 212. For Mason Industries, this applies to the rubber manufacturing, milling and calendaring operation.

6 NYCRR 228.1 (d)
This regulation states that the facility, once applicable, will remain subject to the provisions of 6NYCRR Part 228 even if potential emissions are reduced. Mason Industries is located in the New York Metropolitan Area which operates an surface coating operation which qualifies as miscellaneous metal parts coating in Table 1.

6 NYCRR 228.3 (a)
This regulation prohibits the use of coatings that exceed the maximum pounds of VOC per gallon of coating at the facility as per Table 1 of 228.7 and Table 2 of 228.8. The limit for this facility is 3.0 pounds of VOC per gallon. Mason Industries is located in the New York Metropolitan Area which operates an surface coating operation which qualifies as miscellaneous metal parts coating in Table 1.

6 NYCRR 228.4
This regulation limits the opacity from surface coating operations to no more than 20 percent in any consecutive 6 minute period. Mason Industries is located in the New York Metropolitan Area which operates an surface coating operation which qualifies as miscellaneous metal parts coating in Table 1.

6 NYCRR 228.5 (a)
This regulation outlines recordkeeping requirements for demonstrating compliance with 6NYCRR Part 228. Records must be kept on-site and made available to the department upon request. Mason Industries is located in the New York Metropolitan Area which operates an surface coating operation which qualifies as miscellaneous metal parts coating in Table 1.

6 NYCRR 228.6 (a)
This regulation prohibits the facility from selling, using or requiring for use any coating which does not

meet the requirements of 6NYCRR Part 228. Mason Industries is located in the New York Metropolitan Area which operates an surface coating operation which qualifies as miscellaneous metal parts coating in Table 1.

Non Applicability Analysis
List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
0-00001	6 NYCRR Part 212	General Process Emission Sources

Reason: This emission unit and associated processes P01 and P03 are exempt from the requirements of 6NYCRR Part 212 as per 212.7(l). Volatile organic compound emissions are regulated by 6NYCRR Part 228 and are not given an A rating.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification
Summary of monitoring activities at MASON INDUSTRIES PROPERTY:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	5	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
0-00002	36	intermittent emission testing
0-00002	37	monitoring of process or control device parameters as surrogate
0-00001	31	work practice involving specific operations
0-00001	32	monitoring of process or control device parameters as surrogate
0-00001	33	record keeping/maintenance procedures
0-00001/-/P01	34	record keeping/maintenance procedures

Basis for Monitoring

Condition 6 – 6NYCRR Part 201-6.5(c)(3)(ii)

The facility must notify the department of any permit deviations and incidences of noncompliance as required by this Part. Compliance is determined by the accurate and timely submission of these notifications. This monitoring requirement applies to all Title Vfacilities.

Condition 7 – 6NYCRR Part 202-2.1

The facility must submit emission statements as described in 6 NYCRR Part 202-2 in order to demonstrate compliance with this requirement. This monitoring requirement applies to all Title Vfacilities.

Condition 23 – 6NYCRR Part 201-6.5(e)

Compliance certifications must be made in accordance with the provisions of this Part in order to demonstrate compliance with this requirement. This monitoring requirement applies to all Title Vfacilities.

Condition 36 – 6NYCRR Part 228.3(a)

Compliance is demonstrated by the periodic random sampling of coatings and comparing analytical results with the standard given in 6NYCRR Part 228.

Condition 38 – 6NYCRR Part 228.5(a)

The facility must obtain and keep certifications from coating suppliers or manufacturers that verify the parameters used to determine the actual VOC content of all coatings used at the facility. Purchase, usage and/or production records must also be maintained. These records must be provided to the department upon request.

Condition 31 – 40 CFR 63 Subpart MMMM.3930

The facility must keep records as described in this subpart to demonstrate compliance with this condition. These records must be provided to the department upon request. Failure to keep these records is a deviation from the applicable standard, and must be included in the semiannual report.

Condition 32 – 40 CFR 63 Subpart MMMM.3951

The facility must demonstrate compliance with the “emission rate without add-on controls” option by following the procedure outlined in this Part.

Condition 33 – 40 CFR 63 Subpart MMMM.3952

Compliance with this requirement is determined by calculating the rolling 12-month emission rate at the end of each month by performing the calculations in 63.3951 (a) through (g) using data from the previous 12 months of operation. The emission rate must be less than 2.6 pounds of organic HAP per gallon of coating solids during each compliance period. Any compliance periods that exceed this limit must be reported in the semiannual report.

Condition 37 – 6NYCRR Part 228.4

Compliance is demonstrated by periodic observation of emission points. Opacity is not to exceed 20% during any consecutive 6 minute period.

Condition 39 – 40 CFR 63 Subpart MMMM.3890(b)(1)

Compliance is demonstrated by limiting emissions to no more than 2.6 pounds of organic HAP per gallon of coating solids used during each 12 month compliance period using the emission rate without add-on controls option.

Condition 40 – 40 CFR 63 Subpart MMMM.3891(b)

Compliance is demonstrated by calculating the rolling 12-month organic HAP emission rate on a monthly basis and comparing the result to the standard. This rate must not exceed 2.6 pounds of organic HAP per gallon of coating solids.

Condition 43 – 40 CFR 63 Subpart MMMM.3920(a)

Compliance is demonstrated by the timely submission of semiannual reports meeting the requirements of paragraphs (a)(1) through (7). This report must include any deviations from the applicable standards.

Condition 44 – 40 CFR 63 Subpart MMMM.3920(c)
If the facility opts to install add-on controls to meet the requirements of 40 CFR 63, Subpart MMMM, the facility's required startup, shutdown or malfunction plan (SSM) must require the following reports. If the owner/operator actions are consistent with the SSM plan, the information specified in Subpart A of Part 63 is included in the semiannual report. Otherwise the facilty must submit an immediate SSM report within 2working days followed by a letter to the EPA Administrator within 7 working days after the event providing the information specified in Subpart A of Part 63.

Condition 46 – 40 CFR 63 Subpart MMMM.3950

Compliance is demonstrated by the timely completion of the initial compliance demonstration as outlined in this Part.

Condition 42 – 40 CFR 63 Subpart MMMM.3910(c)

Compliance is demonstrated by the timely submission of the notification of compliance status. This notification must contain all of the information listed in this subpart to be accepted by the department.

Condition 48 – 6NYCRR Part 212.4(c)

Compliance is demonstrated by periodic monitoring of the emission point that demonstrates that the particulate emissions do not exceed 0.050 grains per cubic foot of exhaust gas.

Condition 49 – 6NYCRR Part 212.6(a)

Daily observations of the stack outlet while the rubber production process is operating must be made to demonstrate compliance with this requirement. These observations must be recorded in a bound log book and be made available to the Department upon request. If visible emissions exceeding the standard are observed for two consecutive days, an EPA Method 9 visible emissions test must be performed by a

certified observer. Semiannual and annual compliance reports must include a summary of these observations.