

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

Facility Identification Data

Name: BARKER BROS - RIDGEWOOD
Address: 1666 SUMMERFIELD ST
RIDGEWOOD, NY 11385

Owner/Firm

Name: BARKER BROS INC
Address: 1666 SUMMERFIELD ST
RIDGEWOOD, NY 11385-5748, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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Air Permitting Contact:
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1666 SUMMERFIELD ST
RIDGEWOOD, NY 11385
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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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

Summary Description of Proposed Project

Application is for a renewal to an existing Title V Air Permit that was issued on 5/17/2000 and is due to expire on 5/16/2005. Operations at the facility and emissions from the facility will remain unchanged. Emission Unit U-00001, consists of four (4) drying ovens D1, D2, D3 and D4, which are identified as Emission Sources 000D1, 000D2, 000D3 and 000D4, respectively. Prior to 7/18/2000, each drying oven had two (2) emission points. Both 10" ducts and exhaust fans from Dryer Ovens D1, D2 and D3 were removed on 7/18/2000, thereby eliminating existing emission points 00001, 00002, 00003, 00004, 00005 and 00006. A new manifold was fabricated above ovens D1, D2 and D3 and each oven was connected into the manifold. The outlet of the manifold was directed through the roof to the inlet of a new 24" Backward inclined Blower having a capacity of 9500 CFM. The blower would discharge through a 24" diameter duct, which is at the same elevation as the six existing 10" vents (Emission Points 00007, 00008, 00016, 00017, 00018 & 00019) that are currently discharging emissions. This new emission point is designated as Emission Point 0001A.

Attainment Status

BARKER BROS - RIDGEWOOD is located in the town of QUEENS in the county of QUEENS. 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

The facility manufactures cloth buffing wheels utilizing compliant impregnation and coating materials. The process, conducted in several buildings, involves preparation of the cloth fabric by cutting and shaping, impregnation of the fabric with various agents and colors and drying the buffing wheels. There are six (6) natural gas fired drying ovens (D1, D2, D3, D4, D5 & D6), which are identified as Emission

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005



Sources 000D1, 000D2, 000D3, 000D4, 000D5 & 000D6, respectively, as well as ancillary and auxiliary processing operations such as solvent immersion, solvent extraction and solvent recovery which are used in the impregnation facet of the process.

Process and building heating requirements are supplied by three (3) distillate and one (1) natural gas fired boilers and twenty (20) natural gas space heating units. All units are less than 10 MM BTU/hr input capacity.

Permit Structure and Description of Operations

The Title V permit for BARKER BROS - RIDGEWOOD 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.

BARKER BROS - RIDGEWOOD is defined by the following emission unit(s):
Emission unit U00001 - Four (4) Genrich and Genrich Natural Gas Fired Drying Ovens (D1, D2, D3 & D4), which are identified as Emission Sources 000D1, 000D2, 000D3 & 000D4, respectively, are used to dry the impregnated cloth buffing wheels (Process P01). Each drying oven had two (2) exhaust points to the atmosphere. As of 7/18/2000, the emissions from Drying Ovens D1, D2 & D3 will travel through a common manifold. The outlet of the manifold will be directed through the roof to the inlet of a new Backward inclined Blower which will discharge through a common new Emission Point 0001A. Therefore, Emission Points 00001, 00002, 00003, 00004, 00005 & 00006 have been removed as of 7/18/2000. The emissions from Drying Oven D4 will continue to exhaust through Emission Points 00007 & 00008. Emissions from these ovens are subject to the "as applied" VOC limits of 2.9 pounds per gallon less water and exempt solvents for fabric coatings established in 6NYCRR, Part 228.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

Process P01 is associated with this emission unit, U-00001, Emission Points 00007, 00008 & 0001A and Emission Sources 000D1, 000D2, 000D3 & 000D4.

Emission unit U00001 is associated with the following emission points (EP): 00007, 00008, 0001A

It is further defined by the following process(es):

Process: P01 is located at 1ST, Building M1 - Cloth fabrics are cut, impregnated and dried in the manufacture of cloth buffing wheels. Four Genrich & Genrich natural gas fired drying ovens (D1, D2, D3 & D4), which are identified as Emission Sources 000D1, 000D2, 000D3 & 000D4, respectively, are used with each drying oven exhausting through a common roof mounted blower and emitting through Emission Points 0001A, 00007 & 00008 to atmosphere. The emissions from Drying Ovens D1, D2 & D3 exhaust through a common Emission Point 0001A, then to the atmosphere, while the emissions from Drying Oven D4 continue to exhaust through Emission Points 00007 & 00008, then to the atmosphere. Emissions from these ovens are subject to the "as applied" VOC limits of 2.9 pounds per gallon less water and exempt solvents for fabric coatings established in 6NYCRR, Part 228.

Emission unit U00009 - Four (4) immersion tanks (T1, T3, T4 & T5), which are identified as Emission Sources 000T1, 000T3, 000T4 & 000T5, respectively, and two (2) extractors (E1 & E3), which are identified as Emission Sources 000E1 & 000E3, respectively, are used in the impregnation of cloth buffing wheels (Process P02). Also included is a solvent recovery still, which is identified as Emission Source 000S1, as an ancillary piece of processing equipment. The emissions from these emission sources exhaust through two emission stacks identified as Emission Points 00009 & 00023.

Process P02 is associated with this emission unit, U-00009, Emission Points 00009 & 00023 and Emission Sources 000T1, 000T3, 000T4, 000T5, 000E1, 000E3 & 000S1.

Emission unit U00009 is associated with the following emission points (EP): 00009, 00023

It is further defined by the following process(es):

Process: P02 is located at 1ST, Building M1 - Cloth fabrics are cut, impregnated and dried in the manufacturer of cloth buffing wheels. Four (4) immersion tanks (T1, T3, T4 & T5), which are identified as Emission Sources 000T1, 000T3, 000T4 & 000T5, respectively, and two (2) extractors (E1 & E3), which are identified as Emission Sources 000E1, 000E3, respectively, are used in the impregnation facet of the process. Solvent is recovered and recycled by a solvent recovery still which is ancillary to the processing operation.

Emission unit U00010 - Two (2) hand trimmers (C3 & C4), which are identified as Emission Sources 000C3 & 000C4, respectively, and two (2) raking machines (C5 & C6), which are identified as Emission Sources 000C5 & 000C6, respectively, are used to prepare the cloth fabric prior to the manufacture of cloth buffing wheels (Process P05). All of the equipments exhaust through a cyclone and lint box through common duct work that is identified as Emission Point 00010.

Process P05 is associated with this emission unit, U-00010, Emission Point 00010 and Emission Sources 000C3, 000C4, 000C5 & 000C6 and Emission Control 000C2.

Emission unit U00010 is associated with the following emission points (EP): 00010

It is further defined by the following process(es):

Process: P05 is located at 1ST/ROOF, Building M2 - Cloth fabrics are cut, impregnated and dried in the

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005



manufacture of cloth buffing wheels. Two (2) hand trimmers (C3 & C4), which are identified as Emission Sources 000C3 & 000C4, respectively, and two (2) raking machines (C5 & C6), which are identified as Emission Sources 000C5 & 000C6, are used in the initial preparation of the cloth. All pieces of equipment exhaust through common duct work that is identified as Emission Point 00010 and then to a cyclone and lint box.

Emission unit U00011 - A 55-gallon mixing drum (C2A), which is identified as Emission Source 00C2A, is used to prepare the chemical constituents (Process P03) for the impregnation of cloth fabrics used in the manufacture of cloth buffing wheels. The emissions from Emission Source 00C2A exhaust through an emission stack identified as Emission Point 00011.

Process P03 is associated with this emission unit, U-00011, Emission Point 00011, Emission Source 00C2A and Emission Control 00C1A.

Emission unit U00011 is associated with the following emission points (EP):
00011

It is further defined by the following process(es):

Process: P03 is located at 1ST, Building M1 - Cloth fabrics are cut, impregnated and dried in the manufacture of cloth buffing wheels. A 55- gallon mixing drum (C2A), which is defined as Emission Source 00C2A, is used to prepare the chemicals utilized in the impregnation step.

Emission unit U00012 - Two (2) air drying cabinets (AD1 & AD2), which are identified as Emission Sources 00AD1 & 00AD2, respectively, are used in the manufacturing of cloth buffing wheels (Process P04). The emissions from the two cabinets exhaust to the atmosphere through a common emission stack identified as Emission Point 00012.

Process P04 is associated with this emission unit, U-00012, Emission Point 00012 and Emission Sources 00AD1 & 00AD2.

Emission unit U00012 is associated with the following emission points (EP):
00012

It is further defined by the following process(es):

Process: P04 is located at 1ST, Building M1 - Cloth fabrics are cut, impregnated and dried in the manufacture of cloth buffing wheels. Two (2) air drying cabinets (AD1 & AD2), which are identified as Emission Sources 00AD1 & 00AD2, respectively, are used to dry the wheels and exhaust to the atmosphere through a common emission stack that is identified as Emission Point 00012.

The two immersion tanks and extractor for preparing fabric do not exhaust to an emission point.

Emission unit U00013 - Manufacture of cloth buffing wheels including cutting, impregnating and drying steps as well as ancillary and auxiliary operations including R&D, laboratory, quality control and maintenance activities.

Processing equipments associated with Emission Unit U-00013 include two (2) dryers (D5 & D6), which are identified as Emission Sources 000D5 & 000D6, respectively, an extractor (E2), which is identified as Emission Source 000E2, an immersion/dip tank (T2), which is identified as Emission Source 000T2, an air drying cabinet (AD3), which is identified as Emission Source 00AD3, a cleaning station (CS1), which is identified as Emission Source 00CS1, a mixing station (MS1), which is identified as Emission



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005

Source 00MS1, a convolute slurry tank (ST1), which is identified as Emission Source 00ST1 and a winding machine (WM1), which is identified as Emission Source 00WM1. The emissions from these emission sources exhaust through several emission stacks identified as Emission Points 00013, 00015, 00016, 00017, 00018, 00019 & 00022.

Process P06 is associated with this emission unit, U-00013, Emission Points 00013, 00015, 00016, 00017, 00018, 00019 & 00022 and Emission Sources 000D5, 000D6, 000E2, 000T2, 00AD3, 00CS1, 00ST1 & 00WM1.

Emission unit U00013 is associated with the following emission points (EP): 00013, 00015, 00016, 00017, 00018, 00019, 00022

It is further defined by the following process(es):

Process: P06 is located at 1ST, Building M3 - Cloth fabrics are cut, impregnated and dried in the manufacture of cloth buffing wheels. Necessary associated and auxiliary operations related to the manufacturing process including R&D, laboratory, quality control and maintenance activities are also performed.

Processing equipments associated with Emission Unit U-00013 include two (2) dryers (D5 & D6), which are identified as Emission Sources 000D5 & 000D6, respectively, an extractor (E2), which is identified as Emission Source 000E2, an immersion/dip tank (T2), which is identified as Emission Source 000T2, an air drying cabinet (AD3), which is identified as Emission Source 00AD3, a cleaning station (CS1), which is identified as 00CS1, a mixing station (MS1), which is identified as 00MS1, a convolute slurry tank (ST1), which is identified as 00ST1, and a winding machine (WM1), which is identified as Emission Source 00WM1.

The slurry tank is similar to an immersion tank but is used for more viscous solutions that are necessary for wound wheels.

Title V/Major Source Status

BARKER BROS - RIDGEWOOD is subject to Title V requirements. This determination is based on the following information:

Barker Bros Inc. in Ridgewood, NY is a major stationary source subject to the Title V requirements because the potential to emit volatile organic compounds from the facility is greater than the 25 ton per year threshold for major facilities located in the severe ozone nonattainment area.

This facility is a major source of VOC emissions. Potential emissions of VOC exceed the major source threshold of 25 tons per year for severe nonattainment ozone areas. However, this facility is a minor and not a major source of HAPs. Potential emissions of any individual HAP is below the 10 tons per year of any individual HAP and below the 25 tons per year of total HAPs based on a 12-month rolling average.

Program Applicability

The following chart summarizes the applicability of BARKER BROS - RIDGEWOOD with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
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**New York State Department of Environmental Conservation
Permit Review Report**



Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005

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

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005

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
3291	ABRASIVE PRODUCTS

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005

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.

Table with 2 columns: SCC Code and Description. Rows include codes like 4-02-043-40 and 4-02-011-99 with descriptions of surface coating operations.

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series 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.

Table with 3 columns: Cas No., Contaminant Name, and PTE. PTE is further divided into lbs/yr and Range. Rows include CARBON MONOXIDE, OXIDES OF NITROGEN, PARTICULATES, PM-10, SULFUR DIOXIDE, and VOC.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Sealing - 6NYCRR Part 200.5
The Commissioner may seal an air contamination source to prevent its

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

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 - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 201-1.2

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

(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 - 6NYCRR Part 201-1.5

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

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item F: Recycling and Salvage - 6NYCRR Part 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 -

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

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

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

Item I: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 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 J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 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 K: 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item L: 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 M: 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 N: 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 O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

have been necessary in order to maintain compliance with the conditions of this permit.

Item Q: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Item T: 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 U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

Item W: 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:

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

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 Y: Required Emission Tests - 6 NYCRR Part 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 6NYCRR Part 202-1.

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

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.

Item AA: Open Fires - 6 NYCRR Part 215

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

Item BB: 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

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005

FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	23
FACILITY	6NYCRR 200.3	False Statement.	1
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	47
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	2, 24, 25
FACILITY	6NYCRR 201-6.5 (c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5 (c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5 (e)	Compliance Certification	6
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	48
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	9, 10
U-00009/00023/P02	6NYCRR 212.3 (a)	General Process Emission Sources - emissions from existing emission sources	31
U-00010/-/P05	6NYCRR 212.3 (a)	General Process Emission Sources - emissions from existing emission sources	33
U-00010	6NYCRR 212.3 (b)	General Process Emission Sources - emissions from existing emission sources	32
U-00010/00010/P05	6NYCRR 212.3 (b)	General Process Emission Sources - emissions from existing emission sources	34
U-00011	6NYCRR 212.3 (b)	General Process Emission Sources - emissions from existing emission sources	35
U-00011/00011/P03	6NYCRR 212.3 (b)	General Process Emission Sources - emissions from existing emission sources	37
FACILITY	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	11
FACILITY	6NYCRR 221.2	Prohibition.	49
FACILITY	6NYCRR 228.10	Handling, storage and	21

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005

		disposal of VOCs	
U-00009	6NYCRR 228.2	Definitions	27
U-00012	6NYCRR 228.2	Definitions	38
U-00013	6NYCRR 228.2	Definitions	42
FACILITY	6NYCRR 228.3 (a)	Recordkeeping, reports for VOCs	12
FACILITY	6NYCRR 228.4	Opacity	13
FACILITY	6NYCRR 228.5 (a)	VOC recordkeeping by the facility	14
FACILITY	6NYCRR 228.5 (b)	Use of Methods 311 or 24.	15, 16
FACILITY	6NYCRR 228.5 (c)	Altnate sampling and analysis methods	17
U-00009	6NYCRR 228.5 (d)	Department Access to Obtain Samples	28
U-00012	6NYCRR 228.5 (d)	Department Access to Obtain Samples	39
U-00013	6NYCRR 228.5 (d)	Department Access to Obtain Samples	43
FACILITY	6NYCRR 228.6 (a)	Prohibition of Sale	18
FACILITY	6NYCRR 228.7	Table 1	19
U-00001/-/P01	6NYCRR 228.7	Table 1	26
U-00009/-/P02	6NYCRR 228.7	Table 1	29
U-00011/-/P03	6NYCRR 228.7	Table 1	36
U-00012/-/P04	6NYCRR 228.7	Table 1	40
U-00013/-/P06	6NYCRR 228.7	Table 1	44
FACILITY	6NYCRR 228.9	Products regulated	20
U-00009/-/P02	6NYCRR 228.9	Products regulated	30
U-00012/-/P04	6NYCRR 228.9	Products regulated	41
U-00013/-/P06	6NYCRR 228.9	Products regulated	45

Applicability Discussion:

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

ECL 19-301.

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.

6NYCRR Part 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.

6NYCRR Part 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,

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

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.

6NYCRR Part 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.

6NYCRR Part 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.

6NYCRR Part 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.

6NYCRR Part 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.

6NYCRR Part 202-2.1

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

6NYCRR Part 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.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

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 Part 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.

40 CFR Part 68.

This Part lists the regulated substances and their 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, BARKER BROS - RIDGEWOOD has been determined to be subject to the following regulations:

6NYCRR 200.3

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

6NYCRR 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.

6NYCRR 212.3 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for existing (on or before July 1, 1973) process emission sources.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

6NYCRR 212 .3 (b)

This rule requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 221 .2

This citation prohibits any person to engage in or allow surface coating by the spraying of asbestos or asbestos-containing materials.

6NYCRR 228 .10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6NYCRR 228 .2

This citation specifies the formula used to calculate the maximum permitted pounds of volatile organic compound per gallon of coating specified in tables 1 and 2 of 6 NYCRR Part 228.

6NYCRR 228 .3 (a)

This citation prohibits the use of coatings that exceed the maximum permitted pounds of volatile organic compounds per gallon, unless a coating system meeting certain requirements is used.

6NYCRR 228 .4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6NYCRR 228 .5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228 , to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6NYCRR 228 .5 (b)

This citation requires the owner and operator of any emission source subject to Part 228 to, upon request by the Department, use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005

and 60, to measure the volatile content, water content, density, volume of solids and weight of solids in order to determine the actual VOC content of an applied coating during a compliance demonstration.

6NYCRR 228 .5 (c)

This citation allows alternate sampling and analysis methods to be used, subject to the approval of the Department and the Administrator.

6NYCRR 228 .5 (d)

This citation allows representatives of the Department to obtain coating samples during reasonable business hours, for the purpose of determining compliance.

6NYCRR 228 .6 (a)

This citation exempts specific coatings (or under specific conditions) from the prohibition of sale or specification.

6NYCRR 228 .7

Table 1 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6NYCRR 228 .9

This citation allows the Department to determine, based on inspections or the process, emission source, and product being coated, the maximum permitted pounds of VOC per gallon of coating at application, even if it is not specifically identified in Tables 1 or 2 of Part 228..

Compliance Certification

Summary of monitoring activities at BARKER BROS - RIDGEWOOD:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	record keeping/maintenance procedures	7
FACILITY	monitoring of process or control device parameters as surrogate	10
U-00010	record keeping/maintenance procedures	32
U-00010/00010/P05	intermittent emission testing	34
U-00011	record keeping/maintenance procedures	35
U-00011/00011/P03	intermittent emission testing	37
FACILITY	monitoring of process or control device parameters as surrogate	11
FACILITY	record keeping/maintenance procedures	21
U-00009	record keeping/maintenance procedures	27
U-00012	record keeping/maintenance procedures	38
U-00013	record keeping/maintenance procedures	42
FACILITY	monitoring of process or control device parameters as surrogate	13
FACILITY	record keeping/maintenance procedures	14
FACILITY	record keeping/maintenance procedures	16
FACILITY	record keeping/maintenance procedures	17



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005

FACILITY	work practice involving specific operations	19
U-00001/-/P01	work practice involving specific operations	26
U-00009/-/P02	work practice involving specific operations	29
U-00011/-/P03	work practice involving specific operations	36
U-00012/-/P04	work practice involving specific operations	40
U-00013/-/P06	work practice involving specific operations	44

Basis for Monitoring

Condition 5 for 6 NYCRR 201-6.5(c)(3)(ii): This is a facility-wide condition for Recordkeeping/Maintenance Procedures. This condition 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.

Condition 6 for 6 NYCRR 201-6.5(e): This is a facility-wide condition for Recordkeeping/Maintenance Procedures. This condition specifies the overall permit requirements for compliance certification, including emission limitations, standards or work practices.

Condition 7 for 6 NYCRR 202-2.1: This is a facility-wide condition for Recordkeeping/Maintenance Procedures. This condition sets forth the applicability criteria for submitting an annual statement of emissions. The criteria is based on annual emission threshold quantities and ozone attainment designation. This condition is a requirements for all Title V facilities. These facilities must submit an annual emission statement by April 15th of each year for emissions of the previous calendar year.

Condition 10 for 6 NYCRR 211.3: This is a facility-wide condition. This condition is for Monitoring of Process or Control Device Parameters as Surrogate of visible emissions for opacity. This condition requires that the opacity of the emissions from any air contamination source to be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

Condition 11 for 6 NYCRR 212.6(a): This is a facility-wide condition for Monitoring of Process or Control Device Parameters as Surrogate for particulates. This condition specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

Condition 13 for 6 NYCRR 228.4: This is a facility-wide condition for Monitoring of Process or Control Device Parameters as Surrogate for opacity. This condition requires the opacity of the emissions from a facility, with surface coating processes subject to this rule, to be less than 20 % during any consecutive six minute period. Opacity limits are used primarily to control the quantity of particulates released from a source.

Condition 14 for 6 NYCRR 228.5(a): This is a facility-wide condition for Recordkeeping/Maintenance Procedures. This condition provides the recordkeeping requirements for emission sources subject to this rule. All of these records must be kept for at least five years and provided to the Department upon request.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1

06/10/2005



Condition 16 for 6 NYCRR 228.5(b): This is a facility-wide condition for Recordkeeping/Maintenance Procedures for VOC. This condition requires the owner and operator of any emission source subject to Part 228 to, upon request by the Department, use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, to measure the volatile content, water content, density, volume of solids and weight of solids in order to determine the actual VOC content of an applied coating during a compliance demonstration.

Condition 17 for 6 NYCRR 228.5(c): This is a facility-wide condition for Recordkeeping/Maintenance Procedures. This condition allows alternate sampling and analysis methods to be used, subject to the approval of the Department and the Administrator.

Condition 19 for 6 NYCRR 228.7: This is a facility-wide condition for Work Practice Involving Specific Operations for VOC for VOC content in coatings used for the surface coating of fabrics. Table 1 provides a list of surface coating processes and the corresponding allowable VOC content of the coatings used in each process. This condition, which is taken from Table 1, provides the VOC limit for fabric surface coating as a maximum of 2.9 pounds per gallon of coating (minus water and excluded VOC) as applied.

Condition 21 for 6 NYCRR 228.10: This is a facility-wide condition for daily Recordkeeping/Maintenance Procedures. This condition provides the requirements for handling, storage, and disposal of VOCs are provided in this section.

Condition 26 for 6 NYCRR 228.7: This condition is for Work Practice Involving Specific Operations that applies to EU: U-00001 & Proc: P01 for VOC content in coatings used for the surface coating of fabrics. Table 1 provides a list of surface coating processes and the corresponding allowable VOC content of the coatings used in each process. This condition, which is taken from Table 1, provides the VOC limit for fabric surface coating as a maximum of 2.9 pounds per gallon of coating (minus water and excluded VOC) as applied.

Condition 27 for 6 NYCRR 228.2: This condition is for Recordkeeping/Maintenance Procedures for VOC for EU:U-00009 for the formula for VOC allowed content for all surface coatings. This condition provides definitions for the important terms used in this rule.

Condition 29 for 6 NYCRR 228.7: This condition is for Work Practice Involving Specific Operations that applies to EU: U-00009 & Proc: P02 for VOC content in coatings used for the surface coating of fabrics. Table 1 provides a list of surface coating processes and the corresponding allowable VOC content of the coatings used in each process. This condition, which is taken from Table 1, provides the VOC limit for fabric surface coating as a maximum of 2.9 pounds per gallon of coating (minus water and excluded VOC) as applied.

Condition 32 for 6 NYCRR 212.3(b): This condition is for Recordkeeping/Maintenance Procedures for Particulates for EU:U-00010 for weekly inspection of areas adjacent to emission points for evidence of particulate fallout. This condition requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 2-6305-00005/00024 Renewal Number: 1



06/10/2005

Condition 34 for 6 NYCRR 212.3(b): This condition is for Intermittent Emission Testing for Particulates for EU:U-00010, EP: 00010 and Proc: 05. This condition requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

Condition 35 for 6 NYCRR 212.3(b): This condition is for Recordkeeping/Maintenance Procedures for Particulates for EU:U-00011 for weekly inspection of areas adjacent to emission points for evidence of particulate fallout. This condition requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

Condition 36 for 6 NYCRR 228.7: This condition is for Work Practice Involving Specific Operations for VOC that applies to EU: U-00011 & Proc: 03 for VOC content in coatings used for the surface coating of fabrics. Table 1 provides a list of surface coating processes and the corresponding allowable VOC content of the coatings used in each process. This condition, which is taken from Table 1, provides the VOC limit for fabric surface coating as a maximum of 2.9 pounds per gallon of coating (minus water and excluded VOC) as applied.

Condition 37 for 6 NYCRR 212.3(b): This condition is for Intermittent Emission Testing for Particulates for EU:U-00011, EP: 00011 & Proc: 03. This condition requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

Condition 38 for 6 NYCRR 228.2: This condition is for Recordkeeping/Maintenance Procedures for VOC for EU:U-00012 for the formula for VOC allowed content for all surface coatings. This condition provides definitions for the important terms used in this rule.

Condition 40 for 6 NYCRR 228.7: This condition is for Work Practice Involving Specific Operations for VOC that applies to EU: U-00012 & Proc: 04 for VOC content in coatings used for the surface coating of fabrics. Table 1 provides a list of surface coating processes and the corresponding allowable VOC content of the coatings used in each process. This condition, which is taken from Table 1, provides the VOC limit for fabric surface coating as a maximum of 2.9 pounds per gallon of coating (minus water and excluded VOC) as applied.

Condition 42 for 6 NYCRR 228.2: This condition is for Recordkeeping/Maintenance Procedures for VOC for EU:U-00013. This condition provides definitions for the important terms used in this rule.

Condition 44 for 6 NYCRR 228.7: This condition is for Work Practice Involving Specific Operations for VOC that applies to EU: U-00013 & Proc: P06 for VOC content in coatings used for the surface coating of fabrics. Table 1 provides a list of surface coating processes and the corresponding allowable VOC content of the coatings used in each process. This condition, which is taken from Table 1, provides the VOC limit for fabric surface coating as a maximum of 2.9 pounds per gallon of coating (minus water