



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 2-6305-00005/00024

Renewal Number: 2

07/06/2010

Facility Identification Data

Name: BARKER BROS - RIDGEWOOD

Address: 16-66 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

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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.

Summary Description of Proposed Project

Application for renewal of Air Title V Facility. The facility has an existing Title V Air Permit that was issued on 6/9/2005 and is due to expire on 6/8/2010. 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



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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.

Facility emissions are generated from production-related processes, where cloth fabrics are impregnated with VOC containing coatings and then subsequently dried. Overall, facility's VOC emissions have fallen since the last permit renewal (Ren 1), reflecting the general economic conditions at this time. In 2007, the total VOC emissions were 69,042 pounds, compared with 49,640 pounds in 2008.

The following equipments were removed on 7/1/2008 from the current permit under this renewal. Although this equipment is still in operation, their emissions are no longer vented through a stack, they are vented internally to a lint box :

Two (2) Hand Trimmers (Emission Sources 000C3 & 000C4), and one (1) Raking Machine (Emission Source 000C6).

The following equipments are being added under this renewal: One (1) Winding Machine (Emission Source 00WM2) on 8/1/2009, and one (1) Mixing Station (Emission Source 00MS2) on 9/15/2009.

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:

Baker Brothers, located at 1666 Summerfield Street in Ridgewood, NY, manufactures cloth buffing wheels utilizing compliant impregnation and coating materials. Cloth Fabric is cut and shaped and



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impregnated with various coatings, which provide the buffing cloths with their abrasive and polishing characteristics. The Industrial classification Code (SIC) for this facility is 3291 - Abrasive Products.

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 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 one (1) distillate and five (5) natural gas fired boilers and twenty-seven (27) natural gas fired space heating units. All units are less than 10 MM BTU/hr input capacity.

Raking machines to remove lint and hand trimmers are used to prepare the cloth fabric face after the manufacturer of the buffing wheels as described in Emission Unit U-00010. Emissions from these operations are controlled by a cyclone and subject to the 0.15 gr/dscf particulate emission limitation of 6 NYCRR 212.3(b). The coatings used are formulated by the company and prepared in a 55-gallon drum as described in Emission Unit U-00011 and which has a fabric filter to control particulate emissions. These particulate emissions are also regulated by 6 NYCRR 212.3(b). Compliance will be demonstrated with the 6 NYCRR 212.3(b) requirements by a routine maintenance program for the cyclone and fabric filter. The solvent recovery still identified in Emission Unit U-00009 is regulated by 6 NYCRR 212.3(a) Table 2. The sources subject to 6 NYCRR 212 are also subject to the opacity requirement of 6 NYCRR 212.6(a).

The coatings used in the immersion, slurry and clip tanks at the facility and described in Emission Units U-00009, U-00012, and U-00013 are limited to the VOC content of 2.9 pounds per gallon less water and excluded solvent as applied specified in 6 NYCRR 228 Table 1 for fabric coating lines. Associated operations consisting of the drying ovens in Emission Unit U-00001, the air drying cabinets in Emission Unit U-00012, and the various drying and mixing operations in Emission Unit U-00013 are also regulated by this same as applied VOC content of coatings used in the impregnation tanks. Calculations submitted with the permit application demonstrate compliance with the as applied limit. The facility will maintain records of all coatings used at the facility on an as applied basis to demonstrate compliance with the requirements of 6 NYCRR 228.

Facility emissions are generated from production-related processes, where cloth fabrics are impregnated with VOC containing coatings and then subsequently dried. Overall, facility's VOC emissions have fallen since the last permit renewal (Ren 1), reflecting the general economic conditions at this time. In 2007, the total VOC emissions were 69,042 pounds, compared with 49,640 pounds in 2008.

The facility, having actual annual emissions of volatile organic compounds (VOC) greater than 25 tons per year, is subject to the Title V permitting requirements of 6 NYCRR Part 201 and 40 CFR Part 70. The Title V permit contains a complete listing of the applicable federal, state and compliance monitoring requirements for the facility, its emission units and emission points.

The following equipment are permitted under the current permit (renewal 1) and will remain unchanged under this renewal 2:

Six (6) Genrich & Genrich natural gas fired drying ovens (Emission Sources: 000D1, 000D2, 000D3, 000D4, 000D5 & 000D6).

Four (4) Immersion tanks (Emission Sources: 000T1, 000T2, 000T3, 000T4 & 000T5)



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Three (3) Extractors (emission Sources: 000E1, 000E2 & 000E3)
Two (2) Air drying cabinets (emission Sources: 00AD1, 00AD2, 00AD3)
Two (2) Dust collectors (Emission Controls: 000C2, 00C1A)
One (1) Solvent recovery still (Emission Source: 000S1)
One (1) Raking machine (Emission Source: 000C5)
One (1) 55 Gallon mixing drum (Emission Source: 00C2A)
One (1) Cleaning station (Emission Source: 00CS1)
One (1) Mixing station (emission Source: 00MS1)
One (1) Convolute slurry tank (Emission Source: 00ST1)
One (1) Winding machine (Emission Source: 00WM1)

The following equipment were removed on 7/1/2008 from the current permit under this renewal. Although this equipment is still in operation, their emissions are no longer vented through a stack, they are vented internally to a lint box :

Two (2) Hand trimmers (Emission Sources 000C3 & 000C4), and
One (1) Raking machine (Emission Source 000C6).

The following equipment are being added under this renewal: One (1) Winding Machine (Emission Source 00WM2) on 8/1/2009, and one (1) Mixing Station (Emission Source 00MS2) on 9/15/2009.

The facility operates other sources which are considered exempt from permitting in accordance with 6 NYCRR 201-3.2(c), including one (1) distillate and five (5) natural gas fired boilers, and twenty-seven (27) natural gas space heating units. All units are < 10 MM Btu/hr heat input capacity and they provide process and building heating requirements (seven are in Building M1, five are in Building M2, ten are in Building M3 and eleven are in Building M4). Other exempt sources at the facility include one (1) fuel oil storage tank (<300,000 bbls) in M2 Building, one (1) solvent storage tank (<10,000 gal in Building M1, one (1) exhaust system for laboratory operations in Building M3, and one (1) exhaust system for solvent transfer in Building M4.

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.



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BARKER BROS - RIDGEWOOD is defined by the following emission unit(s):

Emission unit U00001 - Emission Unit U-00001 consists of 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). The emissions from Drying Ovens D1, D2, & D3 exhaust through Emission Point 0001A. Emissions from Drying Oven D4 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.

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

Process: P01 is located at 1ST, Building M1 - Process P01 is the cutting, impregnating and drying of cloth fabrics 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 to dry the impregnated cloth buffing wheels. The emissions from Drying Ovens D1, D2 & D3 exhaust through Emission Point 0001A. Emissions from Drying Oven D4 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.

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

Emission unit U00009 - Emission Unit U-00009 consists of 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

Process: P02 is located at 1ST, Building M1 - Process P02 is the cutting, impregnating and drying of cloth fabrics 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.

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



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Emission unit U00011 - Emission Unit U-00011 consists of 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

Process: P03 is located at 1ST, Building M1 - Process P03 is the cutting, impregnating and drying of cloth fabrics 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.

Process P01 is associated with Emission Unit U-00011, Emission Point 00011, Emission Source 00C2A and Emission Control 00C1A.

Emission unit U00010 - Emission Unit U-00010 consists of one (1) raking machine (C5), which is identified as Emission Source 000C5, is used to prepare the cloth fabric prior to the manufacture of cloth buffing wheels (Process P05). Raking machine C5 exhausts through a cyclone (Emission Control 000C2) and lint box through common duct work that is identified as Emission Point 00010.

Previously associated with this emission unit (U-00010) were an additional two (2) hand trimmers (C3 & C4), which were identified as Emission Sources 000C3 & 000C4); respectively, and one (1) raking machine (C6), which was identified as Emission Source 000C6. These emission sources have been removed on 7/1/2008 from this emission unit. Although these equipments are still in operation at the facility, they are no longer ducted to a stack and exhaust internally to a lint box.

Process P05 is associated with this emission unit, U-00010, Emission Point 00010 and Emission Source 000C5 and Emission Control 000C2.

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

Process: P05 is located at 1ST/ROOF, Building M2 - Process P05 is the the cutting, impregnating and drying of cloth fabrics in the manufacture of cloth buffing wheels. One (1) raking machines (C5), which is identified as Emission Source 000C5, is used to prepare the cloth



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fabric prior to the manufacturer of cloth buffing wheels (Process P05). Emissions from the raking machine, Emission Source 000C5, exhaust through a cyclone (Emission Control 000C2) and lint box through a common duct work that is identified as Emission Point 00010.

Previously associated with this emission unit (U-00010) were an additional two (2) hand trimmers (C3 & C4), which were identified as Emission Sources 000C3 & 000C4; respectively, and one (1) raking machine (C6), which was identified as Emission Source 000C6. These emission sources have been removed on 7/1/2008 from this emission unit. Although these equipments are still in operation at the facility, they are no longer ducted to a stack and exhaust internally to a lint box.

Process P05 is associated with Emission Unit U-00010, Emission Point 00010, Emission Source 000C5 and Emission Control 000C2.

Emission unit U00012 - Emission Unit U-00012 consists of 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

Process: P04 is located at 1ST, Building M1 - Process P04 is the cutting, impregnating and drying of cloth fabrics 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.

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

Emission unit U00013 - Emission Unit U-00013 consists of the manufacturing 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



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identified as Emission Source 00AD3, a cleaning station (CS1), which is identified as Emission Source 00CS1, two (2) mixing stations (MS1 & MS2), which are identified as Emission Sources 00MS1 & 00MS2, a convolute slurry tank (ST1), which is identified as Emission Source 00ST1 and two (2) winding machines (WM1 & WM2), which are identified as Emission Sources 00WM1 & 00WM2. The slurry tank is similar to an immersion tank but is used for more viscous solutions that are necessary for wound wheels. The emissions from these emission sources exhaust through several emission stacks identified as Emission Points 00013, 00015, 00016, 00017, 00018, 00019 & 00022.

Included in the above emission sources are a second Winding Machine (WM2), identified as Emission Source 00WM2, and a second Mixing Station (MS2), identified as Emission Source 00MS2. Emission Source 00WM2 was added to Emission Unit U-00013 on 8/1/2009, and Emission Source 00MS2 was added to Emission Unit U-00013 on 9/15/2009. The emissions associated with the Winding Machines will remain unchanged. Likewise, the emissions associated with the mixing operations will remain unchanged.

Process P06 is associated with Emission Unit U-00013, Emission Points 00013, 00015, 00016, 00017, 00018, 00019 & 00022 and Emission Sources 000D5, 000D6, 000E2, 000T2, 00AD3, 00CS1, 00MS1, 00MS2, 00ST1, 00WM1 & 00WM2.

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

Process: P06 is located at 1ST, Building M3 - Process P06 is the cutting, impregnating and drying steps of cloth fabrics in the manufacture of cloth buffing wheels. Necessary associated ancillary 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 Emission Source 00CS1, two (2) mixing stations (MS1 & MS2), which are identified as Emission Sources 00MS1 & 00MS2, a convolute slurry tank (ST1), which is identified as Emission Source 00ST1 and two (2) winding machines (WM1 & WM2), which are identified as Emission Sources 00WM1 & 00WM2. The slurry tank is similar to an immersion tank but is used for more viscous solutions that are necessary for wound wheels. The emissions from these emission sources exhaust through several emission stacks identified as Emission Points 00013, 00015, 00016, 00017, 00018, 00019 & 00022.

Included in the above emission sources are a second Winding Machine (WM2), identified as Emission Source 00WM2, and a second Mixing Station (MS2), identified as Emission Source 00MS2. Emission Source 00WM2 was added to Emission Unit U-00013 on 8/1/2009, and Emission Source 00MS2 was



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added to Emission Unit U-00013 on 9/15/2009. The emissions associated with the Winding Machines will remain unchanged. Likewise, the emissions associated with the mixing operations will remain unchanged.

Process P06 is associated with Emission Unit U-00013, Emission Points 00013, 00015, 00016, 00017, 00018, 00019 & 00022 and Emission Sources 000D5, 000D6, 000E2, 000T2, 00AD3, 00CS1, 00MS1, 00MS2, 00ST1, 00WM1 & 00WM2.

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
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



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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



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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 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

4-02-011-99

SURFACE COATING OPERATIONS
SURFACE COATING OPERATIONS - FABRIC
COATING/PRINTING
OTHER NOT CLASSIFIED (ALSO SEE NEW CODES
UNDER 4-02-040-XX)

4-02-043-40

SURFACE COATING OPERATIONS
SURFACE COATING OPERATIONS - FABRIC
COATING, DIP COATING
DRYING/CURING

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

Range

000630-08-0
0NY210-00-0

CARBON MONOXIDE
OXIDES OF NITROGEN

> 0 but < 2.5 tpy
>= 2.5 tpy but < 10
tpy

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0NY075-00-0	PARTICULATES	> 0 but < 2.5 tpy
0NY075-00-5	PM-10	> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE	>= 2.5 tpy but < 10 tpy
0NY998-00-0	VOC	>= 250 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)

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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;

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

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

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

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

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit 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



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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	59	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 68	23	Chemical accident prevention provisions
FACILITY	40CFR 82-F	24	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.3	25	False Statement.
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	11	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	60	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	12	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	13	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	14	Exempt Activities - Proof of eligibility



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FACILITY	6NYCRR 201-3.3 (a)	15	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	26, 37, 38	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	16	General conditions
FACILITY	6NYCRR 201-6.5 (a) (7)	2	General conditions
FACILITY	6NYCRR 201-6.5 (a) (8)	17	Fees
FACILITY	6NYCRR 201-6.5 (c)	3	General conditions
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)	18	Compliance schedules
FACILITY	6NYCRR 201-6.5 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5 (f) (6)	19	Off Permit Changes
FACILITY	6NYCRR 202-1.1	20	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	61	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	21, 22	General Prohibitions - visible emissions limited
U-00009/00023/P02	6NYCRR 212.3 (a)	44	General Process Emission Sources - emissions from existing emission sources
U-00010/-/P05	6NYCRR 212.3 (a)	46	General Process Emission Sources - emissions from existing emission sources
U-00010	6NYCRR 212.3 (b)	45	General Process Emission Sources - emissions from existing emission sources
U-00010/00010/P05	6NYCRR 212.3 (b)	47	General Process Emission Sources - emissions from existing emission sources
U-00011	6NYCRR 212.3 (b)	48	General Process Emission Sources - emissions from existing emission sources
U-00011/00011/P03	6NYCRR 212.3 (b)	50	General Process



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FACILITY	6NYCRR 212.6 (a)	27	Emission Sources - emissions from existing emission sources
FACILITY	6NYCRR 215	9	General Process
FACILITY	6NYCRR 215.2	10	Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 221.2	62	Open Fires
FACILITY	6NYCRR 228.10	36	Open Fires - Prohibitions
U-00009	6NYCRR 228.2	40	Prohibition.
U-00012	6NYCRR 228.2	51	Handling, storage and disposal of VOCs
U-00013	6NYCRR 228.2	55	Definitions
FACILITY	6NYCRR 228.3 (a)	28	Definitions
FACILITY	6NYCRR 228.4	29	Recordkeeping, reports for VOCs
FACILITY	6NYCRR 228.5 (a)	30	Opacity
FACILITY	6NYCRR 228.5 (b)	31, 32	VOC recordkeeping by the facility
FACILITY	6NYCRR 228.5 (c)	33	Use of Methods 311 or 24.
U-00009	6NYCRR 228.5 (d)	41	Alternate sampling and analysis methods
U-00012	6NYCRR 228.5 (d)	52	Department Access to Obtain Samples
U-00013	6NYCRR 228.5 (d)	56	Department Access to Obtain Samples
FACILITY	6NYCRR 228.7	34	Department Access to Obtain Samples
U-00001/-/P01	6NYCRR 228.7	39	Table 1
U-00009/-/P02	6NYCRR 228.7	42	Table 1
U-00011/-/P03	6NYCRR 228.7	49	Table 1
U-00012/-/P04	6NYCRR 228.7	53	Table 1
U-00013/-/P06	6NYCRR 228.7	57	Table 1
FACILITY	6NYCRR 228.9	35	Table 1
U-00009/-/P02	6NYCRR 228.9	43	Products regulated
U-00012/-/P04	6NYCRR 228.9	54	Products regulated
U-00013/-/P06	6NYCRR 228.9	58	Products regulated

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



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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



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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 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



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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 Part 215

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.

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 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:

6 NYCRR 200.3

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

6 NYCRR 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.

6 NYCRR 212.3 (b)



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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.

6 NYCRR 212.6 (a)

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

6 NYCRR 221.2

6 NYCRR 228.10

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

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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



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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.

6 NYCRR 228.5 (c)

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

6 NYCRR 228.5 (d)

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

6 NYCRR 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.

6 NYCRR 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	Cond No.	Type of Monitoring

FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	22	monitoring of process or control device parameters as surrogate
U-00010	45	record keeping/maintenance procedures
U-00010/00010/P05	47	intermittent emission testing
U-00011	48	record keeping/maintenance procedures
U-00011/00011/P03	50	intermittent emission testing
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	36	record keeping/maintenance procedures
U-00009	40	record keeping/maintenance procedures
U-00012	51	record keeping/maintenance procedures
U-00013	55	record keeping/maintenance procedures
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures

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FACILITY	34	work practice involving specific operations
U-00001/-/P01	39	work practice involving specific operations
U-00009/-/P02	42	work practice involving specific operations
U-00011/-/P03	49	work practice involving specific operations
U-00012/-/P04	53	work practice involving specific operations
U-00013/-/P06	57	work practice involving specific operations

Basis for Monitoring

This facility is subject to the requirements of Title V and has received a Title V general permit for Combustion Installation. The facility is required, under the provisions of 6 NYCRR Subpart 201-6, to submit quarterly, semiannual compliance reports and an annual Compliance Certification. This facility has to comply with the following monitoring conditions:

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 22 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 27 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 29 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 30 for 6 NYCRR 228.5(a): This is a facility-wide condition for Recordkeeping/Maintenance Procedures. This condition provides the recordkeeping requirements



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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.

Condition 32 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 33 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 34 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 36 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 39 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 40 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 42 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 45 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.

Condition 47 for 6 NYCRR 212.3(b): This condition is for Intermittent Emission Testing for



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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 48 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 49 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 50 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 51 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 53 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 55 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 57 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 and excluded VOC) as applied.