



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

**Permit ID: 3-1302-00017/00017**  
**Renewal Number: 2**  
**12/07/2010**

**Facility Identification Data**

Name: CHEMPRENE INC  
Address: 483 FISHKILL AVE  
BEACON, NY 12508-1200

**Owner/Firm**

Name: CHEMPRENE INC  
Address: 483 FISHKILL AVE  
BEACON, NY 12508-1200, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:  
Name: KENNETH R GRZYB  
Address: NYSDEC REGION 3  
21 S PUTT CORNERS RD  
NEW PALTZ, NY 12561  
Phone: 8452563048

Division of Air Resources:  
Name: VERONICA M WOLAK  
Address: NYSDEC - REGION 3  
21 SOUTH PUTTS CORNERS RD  
NEW PALTZ, NY 12561-1696  
Phone: 8452563058

Air Permitting Contact:  
Name: BILLY GADDAM  
Address: CHEMPRENE INC  
483 FISHKILL AVE  
BEACON, NY 12508  
Phone: 8454404264

**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**

Renewal of Air Title V Facility Permit. Also various conditions and emissions units/points/processes/sources and controls have been revised for further clarity.



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**Attainment Status**

CHEMPRENE INC is located in the town of BEACON in the county of DUTCHESS.

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
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Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10 $\mu$ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO <sub>2</sub> )	ATTAINMENT
Ozone*	MODERATE NON-ATTAINMENT
Oxides of Nitrogen (NO <sub>x</sub> )**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NO<sub>x</sub>) which are ozone precursors.

\*\* NO<sub>x</sub> has a separate ambient air quality standard in addition to being an ozone precursor.

**Facility Description:**

The facility manufactures lightweight conveyor belts and rubber (polymer) coated fabrics. Raw rubber is compounded and mixed to form coatings used on purchased substrates, a majority of which are textile. The facility is comprised of raw product mixing mills, five spreader/oven coating lines and two 20.92 MMBTU/hr boilers capable of firing natural gas or #4 fuel oil. There are several additional emission points at the facility for activities including toluene storage, solvent and rubber mixing vessels and curing/vulcanizing ovens. A catalytic oxidizer is used for the control of VOCs from the solvent-related coating lines.

**Permit Structure and Description of Operations**

The Title V permit for CHEMPRENE INC

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



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control - emission control devices  
process - any device or contrivance which may emit air contaminants  
that is not included in the above categories.

CHEMPRENE INC is defined by the following emission unit(s):

Emission unit B07A08 - Two (2) 1974 Cleaver-Brooks boilers [00B01, 00B02] with an individual rated capacity of 20.9 mmBTU/hr. Each boiler is capable of firing either natural gas or No. 4 fuel oil. Associated emission points are labeled 00007 and 00008.

Emission unit B07A08 is associated with the following emission points (EP):  
00007, 00008

Process: NG1 is located at GROUND, Building BOILERRM - Combustion of natural gas in the boilers.

Process: RES is located at Ground, Building BOILERRM - Combustion of No. 4 fuel oil in the boilers.

Emission unit C00113 - Methyl Ethyl Ketone (MEK) or Toluene is mixed with rubber in numerous small vessels and individual automated working stations to make rubber cement for coating in the churn room. Under negative pressure, fugitive room emissions, vessel, and station emissions are vented directly to the atmosphere through one emissions point (00113).

Emission unit C00113 is associated with the following emission points (EP):  
00113

Process: CRN is located at GROUND, Building PROBDG - This process involves the mixing of Methyl Ethyl Ketone (MEK) or Toluene with rubber in order to make a rubber cement for coating of textiles.

Emission unit CINSIG - \* Bolling Mixer (Process BOL, Source OBMIX) with associated outdoor baghouse (Control BAGBL, Emissions Point 00003)

\* Yards goods duster (Process YAR, Source YDUST) with associated outdoor baghouse (Control YDBAG, Emissions Point 00005)

\* Light mill (Source LMILL) vented directly to atmosphere (Process MIL, Emissions Point 00001)

\*Five vulcanizing lines, three continuous and two batch processes fueled by steam or electric, (one of the five fires natural gas or No. 2 fuel), whereas rubber and fabric are pressed together and subjected to heat in order to carry out the vulcanizing reaction (Process VUL, Emissions Point 00004)

Also a variety of exempt source exhausting indoors including;

\*Dicing of rubber into smaller pieces with associated indoor dust collector.

\*Calendering process involving coating solid rubber onto fabric. Sometimes during this process a zinc stearate dust is applied to the rubber after coating with indoor baghouse.

\*Plastic liner reprocessing.

\*Mica dusting of belts to prevent sticking with associated indoor baghouse.

Emission unit CINSIG is associated with the following emission points (EP):  
00001, 00003, 00004, 00005



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Process: BOL is located at Building PROBDG - This process utilizes an internal mixer where elastomer in solid state is blended with compounding ingredients such as powders and oils.

Process: MIL is located at Building PROBDG - In this open mill process, elastomer in solid state is blended with compounding ingredients such as powders and oils.

Process: VUL is located at Building PROBDG - This process consists of five vulcanizing lines, three continuous (VULC3, VULC4, VULC5) and two batch processes (VULC1, VULC2) fueled by steam or electric, except for VULC3 which runs on natural gas or No. 2 fuel, whereas rubber and fabric are pressed together and subjected to heat in order to carry out the vulcanizing reaction.

Process: YAR is located at Building PROBDG - In this process talc or starch dust is applied to a rubber coated fabric.

Emission unit C SPRDS - Five spreaders labeled sources S0001, S0002, S0003, S0005 (Silicure oven SILOV associated with S0005), S0006. All 5 spreaders are ducted to a catalytic oxidizer (Source CATOX) for control of toluene and MEK emissions through emission point 00006, with a catalytic oxidizer bypass emission point 00009 for unit malfunctions. Spreader bypass emissions points are labeled BYPS1, BYPS2, BYPS3, BYPS4, BYPS5.

These spreaders coat various purchased textiles by use of a knife over roll coater and are dried in six steam (Emission source, STOV1, STOVN, Emissions Points 00128, 00129) or electrical ovens (Emission Source ELON1, ELON2, AIR1, 0AIR2, Emissions Points 00122, 00123, CROVN).

Emission unit C SPRDS is associated with the following emission points (EP):

00006, 00009, 00122, 00123, 00128, 00129, BYPS1, BYPS2, BYPS3, BYPS4, BYPS5, CROVN

Process: BYP This process consists of five (5) knife-over-roll coaters/spreaders fueled by steam whereby various purchased textiles are coated with a rubber cement mixture and emissions are bypassed directly into the atmosphere.

Process: COB is located at Building PROBDG - VOC bypass circumventing Catalytic Ox.

Process: ELE is located at Building PROBDG - Coated textiles (by use of a knife over roll coater) dried in electrical ovens.

Process: NG2 Catalytic oxidizer fueled by natural gas.

Process: PRO Catalytic oxidizer fueled by propane.

Process: STM is located at Building PROBDG - Coated textiles (by use of a knife over roll coater) dried in steam ovens.

**Title V/Major Source Status**

CHEMPRENE INC is subject to Title V requirements. This determination is based on the following information:

Facility potential to emit for regulated contaminant Sulfur Dioxide are over major threshold status.



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**Program Applicability**

The following chart summarizes the applicability of CHEMPRENE INC with regards to the principal air pollution regulatory programs:

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

**NOTES:**

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

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

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

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

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



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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**

3052  
3069

RUBBER AND PLASTICS HOSE AND BELTING  
FABRICATED RUBBER PRODUCTS, NEC

**SCC Codes**

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

**SCC Code**

**Description**

1-03-005-04

EXTERNAL COMBUSTION BOILERS -  
COMMERCIAL/INDUSTRIAL  
COMMERCIAL/INSTITUTIONAL BOILER -  
DISTILLATE OIL  
Grade 4 Oil



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1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
3-01-018-20	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Polymer Drying
3-01-026-11	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - SYNTHETIC RUBBER (MANUFACTURING ONLY) Steam Stripper
3-01-026-14	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - SYNTHETIC RUBBER (MANUFACTURING ONLY) Blending Tanks
3-01-035-52	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC PIGMENTS Pigment Milling
3-01-888-01	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - FUGITIVE EMISSIONS Specify in Comments Field
3-13-999-99	ELECTRICAL EQUIPMENT ELECTRICAL EQUIPMENT - OTHER NOT CLASSIFIED Other Not Classified
3-30-002-14	TEXTILE PRODUCTS TEXTILE PRODUCTS - RUBBERIZED FABRICS Wet Coating Mixing
3-90-010-89	IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE General
3-99-900-13	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS MANUFACTURING INDUSTRIES NATURAL GAS: INCINERATORS

### 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
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		<b>lbs/yr</b>	<b>Range</b>
000117-81-7	BIS (2-ETHYLHEXYL) PHTHALATE	19500	
000630-08-0	CARBON MONOXIDE	5660	
000111-30-8	GLUTARALDEHYDE		> 0 but < 2.5 tpy
0NY100-00-0	HAP	45000	
000078-93-3	METHYL ETHYL KETONE	20000	
0NY210-00-0	OXIDES OF NITROGEN	55960	
0NY075-00-0	PARTICULATES		>= 10 tpy but < 25 tpy
0NY075-00-5	PM-10	26320	
007446-09-5	SULFUR DIOXIDE	277780	
000108-88-3	TOLUENE	19500	
0NY998-00-0	VOC	100100	

**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.





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- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**  
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**  
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**  
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(a)(5)**  
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR 201-6.5(a)(6)**  
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)**  
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.
- Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)**  
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:
- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution

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presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

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



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Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

**Regulatory Analysis**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
-----			
-- FACILITY	ECL 19-0301	41	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63-0000	26	Printing, Coating, and Dyeing of Fabrics
FACILITY	40CFR 63-U	26	Subpart U - NESHAP for Polymer and Resin I - Elastomers
FACILITY	40CFR 68	22	Chemical accident prevention provisions
FACILITY	40CFR 82-F	23	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient



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FACILITY	6NYCRR 200.7	11	air quality.
FACILITY	6NYCRR 201-1.4	42	Maintenance of equipment.
FACILITY	6NYCRR 201-1.7	12	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.8	13	Recycling and Salvage
			Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	15	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	24, 39, 40	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
			Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	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 201-7	25, 26	Federally Enforceable Emissions Caps
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	43	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	21	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 212.10	29	NOx and VOC RACT required at major facilities
FACILITY	6NYCRR 212.4(c)	27	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6	28	Opacity Limitation
FACILITY	6NYCRR 215	9	Open Fires



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FACILITY	6NYCRR 215.2	10	Open Fires -
FACILITY	6NYCRR 225-1.2 (a) (2)	30	Prohibitions
FACILITY	6NYCRR 227-1.3	31	Sulfur in Fuel
FACILITY	6NYCRR 228-1.10	38	Limitations Post
FACILITY	6NYCRR 228-1.3 (b)	32, 33	12/31/87.
FACILITY	6NYCRR 228-1.3 (c)	34	Smoke Emission
FACILITY	6NYCRR 228-1.4	35	Limitations.
FACILITY	6NYCRR 228-1.5	36	Handling, storage and
FACILITY	6NYCRR 228-1.5 (g) (2)	37	disposal of VOCs
			VOC incinerator- 80%
			overall removal
			efficiency
			Solids as applied
			Opacity
			Reports,
			recordkeeping,
			sampling and analysis
			Temperature rise
			across catalytic
			incinerator bed
			monitoring

**Applicability Discussion:**

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

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

6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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



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or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

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

6 NYCRR Subpart 201-6

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

6 NYCRR 201-6.5 (a) (4)

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

6 NYCRR 201-6.5 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.5 (a) (8)

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

6 NYCRR 201-6.5 (c)

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

6 NYCRR 201-6.5 (c) (2)

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



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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 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.



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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, CHEMPRENE INC has been determined to be subject to the following regulations:

40 CFR Part 63, Subpart OOOO

Facility total Hazardous Air Pollutants (HAPs) have been limited below 40 CFR 63 Subpart OOOO applicability.

40 CFR Part 63, Subpart U

Facility total Hazardous Air Pollutants (HAPs) have been limited below 40 CFR 63 Subpart U applicability.

6 NYCRR 212.10

Chemprene Inc is not required to evaluate Reasonably Available Control Technology (RACT) for emission points with volatile organic compound emission rate potentials less than 3.0 pounds per hour.

The Department reserves the right to request future performance testing to verify compliance.

6 NYCRR 212.4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 212.6

The facility shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.





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6 NYCRR 225-1.2 (a) (2)

Chemprene Inc shall not use any fuel in a combustion source which had a sulfur content greater than the limit presented below, as specified in 6NYCRR 225-1.2(d) Table 2.

Fuel Supplier Certifications or bill of lading for all oil fuels stating sulfur in fuel content less than the specified limit below shall be supplied per delivery and be maintained on site for a period of five years, to be made available to the Department upon request. The facility shall submit semi-annually compliance verification.

6 NYCRR 227-1.3

The facility shall not operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.

6 NYCRR 228-1.10

Within the work area(s) associated with a coating line, the facility shall:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents.

Chemprene Inc shall report semi annually that the above have been followed accordingly.



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6 NYCRR 228-1.3 (b)

The catalytic oxidizer, used as a control for VOC emissions, shall operate to provide, at a minimum, 85 percent overall removal efficiency.

Chemprene Inc shall conduct a performance test during the term of this permit to determine VOC destruction efficiency for compliance purposes. The parameters to be monitored shall be continuously measured and recorded during each performance test.

Testing Methods to be used are specified below;

Method 25 shall be used to determine VOC concentrations from incinerator gas streams. Alternative Methods (18 or 25A), may be used as explained in the applicability section of Method 25 in cases where use of Method 25 is demonstrated to be technically infeasible. The owner or operator shall submit notice of the intended test method to the Administrator for approval along with the notification of the performance

test required under §60.8(d) of the General Provisions. The test shall consist of three separate runs, each lasting a minimum of 30 minutes.

Method 1 or 1A is used for sample and velocity traverses;

Method 2, 2A, 2C, or 2D is used for velocity and volumetric flow rates;

Method 3 is used for gas analysis;

Method 4 is used for stack gas moisture;

Methods 2, 2A, 2C, or 2D; 3; and 4 shall be performed, as applicable, at least twice during each test run.

For performance test purposes, sampling ports, platforms and access shall be provided by the facility on the combustion exhaust system in accordance with 40 CFR Part 60.8(e).

At least 60 days prior to actual testing, the facility shall submit to the NYSDEC protocol detailing methods and procedures to be used during the performance stack testing.

Results of emissions testing must be submitted to NYSDEC within 60 days after completion of performance tests. The performance test report shall include appropriate temperature recordings correlated with destruction efficiency determinations, as specified in other permit conditions (6 NYCRR 228.5(g)(2)).

Operation during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

Additional performance testing may be required at the discretion of the NYSDEC.

In the event the utility company curtails fuel supply to the catalytic oxidizer between the period of November 1st through March 31st for the purposes of natural gas conservation, the facility shall alert the Department within 10 days of such notification.



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6 NYCRR 228-1.3 (c)

Oxidizer/catalyst temperature is monitored as a surrogate for post-control VOCs from this emission unit which achieves greater than 85 % overall removal efficiency as correlated with a temperature rise across catalytic incinerator bed greater than or equal to 475 degrees F. As it has been determined that the oxidizer achieves 85% or greater overall removal efficiency, Equation 2 is not applicable.

Performance testing is mandatory once during the term of this permit and is specified in other conditions. The Department may request additional EPA Method testing to verify compliance at any time. Temperature bed rise monitoring requirements are also specified elsewhere in the permit.

The catalytic oxidizer will be in operation at all times when VOC coatings are used in this emission unit, with the exception of up to 100 hours allowable process bypass. This ensures an average annual overall removal efficiency of greater than or equal to 85%. The emissions that circumvent the oxidizer shall be integrated into the facility's overall total emissions.

Certification from the coating supplier/manufacturer, when appropriate, which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained. Purchase, usage and/or production records of the coating material, including solvents, must be maintained.

Records will be maintained, in a bound log book, for all batch runs where the oxidizer was bypassed. These records shall include an explanation of why the oxidizer was bypassed, quantity of rubber used, the name and quantity of chemicals used and quantity of emissions vented to the atmosphere.

Records must be maintained at the facility for a period of five years. Upon request, all records shall be provided to the Department.

6 NYCRR 228-1.4

The facility shall not cause or allow emissions to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period.

The Department reserves the right to perform or require the performance of EPA Method 9 visible emission testing to determine compliance.

6 NYCRR 228-1.5

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Chemprene Inc must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the department. Any facility required to perform the overall removal efficiency calculation set forth in Equation 2 of this Part, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance with this Part must be provided to the department in a format acceptable to the department.

The department may request EPA Method 311 or Method 24 as presented in Appendix A of both 40 CFR parts 63 and 60, respectively (see table 1, section 200.9 of this Title), 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 as applied coating during a compliance demonstration. Method 24 is used to determine the VOC content in coatings. If it is demonstrated to the satisfaction of the Department that coating formulation data are equivalent to Method 24 results, formulation data may be used. In the event of any inconsistency between a Method 24 test and a facility's formulation data, the Method 24 test will govern. For Method 24, the coating sample must be a 1-liter sample collected in a 1-liter container at a point in the process where the sample will be representative of the coating applied to the substrate (i.e., the sample shall include any dilution solvent or other VOC added during the manufacturing process). The container must be tightly sealed immediately after the sample is collected. Any solvent or other VOC added after the sample is taken must be measured and accounted for in the calculations that use Method 24 results.

Representatives of the Department must be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with this Part.

The owner and/or operator of a surface coating process must follow the applicable notification requirements, protocol requirements and test procedures of Part 202 of this Title for testing and monitoring. Depending upon conditions at a test site, one of the following test methods from Appendix A of 40 CFR part 60 (see Table 1, section 200.9 of this Title) must be used when measuring VOC concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

(1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;



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- (2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or
- (3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.

Continuous monitors for the following parameters must be installed, periodically calibrated, and operated when the associated control equipment is operating:

- (1) exhaust gas temperature of all incinerators;
- (2) temperature rise across catalytic incinerator bed;

Any information or record showing noncompliance with the requirements of this Part must be reported to the department within 30 days following notice or generation of the information or record.

All records required by this section must be maintained at the facility for a period of five years.

6 NYCRR 228-1.5 (g) (2)

Chemprene Inc shall continue to operate the inlet catalytic incinerator bed temperature at a minimum of 475 degrees Fahrenheit. An inlet bed temperature of 475 degrees F has been correlated through previous stack testing with a destruction efficiency of at least 85%.

A temperature rise across the bed shall be maintained. To ensure temperature difference, a monitoring device that continuously indicates and records the gas temperature both upstream and downstream of the catalyst bed shall be calibrated, maintained, and operated according to the manufacturer's specifications.

Continuous monitors must be operated at all times when the associated process equipment is operating except during any quality assurance and routine maintenance activities. Recorded data shall be kept on site for a period of 5 years and made available upon the Department's request.

The Catalytic Oxidizer shall be energy efficient and operated in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards, and procedures, inclusive of manufacturer's specifications. The Department reserves the right to require the facility conduct future performance testing to verify VOC capture and



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control efficiencies.

The facility shall verify and submit certification of proper operation of the control device semi-annually. Submission of the actually monitoring temperatures recorded is not required unless requested by the Department.

Chemprene Inc shall keep record of the date, time and duration of all periods the oxidizer was not in operation during the normal operations of the equipment that it controls including startup/shutdown, malfunction or curtailment (limit of 100 hours annually as specified in other conditions). These downtime events shall be reported to the Department semiannually. Malfunction/maintenance events over 4 days shall require written notification to the Department within 30 days of repair/completion of maintenance. These notifications shall describe the date, time, duration, cause, corrective action and summary of emissions related to production activity during the downtime event.

6 NYCRR Subpart 201-7

Computer spreadsheets will be maintained to track HAP containing purchases and amounts used on a monthly basis, and to determine net HAP emissions, such that no individual HAP exceeds 9.75 tons per year emissions and total HAPs do not exceed 22.5 tons per year (In accordance with § 63.4281(b)). Records will be kept on a current 12-month rolling total and reported semiannually.

**Compliance Certification**

**Summary of monitoring activities at CHEMPRENE INC:**

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
---		
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	30	work practice involving specific operations
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	38	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
FACILITY	33	intermittent emission testing



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FACILITY	34	work practice involving specific operations
FACILITY	35	monitoring of process or control device parameters as surrogate
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	monitoring of process or control device parameters as surrogate

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**Basis for Monitoring**

Chemprene Inc is an existing major facility based on potential emissions for Sulfur Dioxide exceeding 100 tons per year.

The facility is not subject to VOC Reasonably Available Control Technology (RACT) under 6 NYCRR 212.10 General Process Emission Sources for emission rate potentials less than 3.0 pounds per hour. Chemprene is required to maintain a list of all emission points subject to this requirement.

Chemprene Inc shall operate and record temperature rise across the catalytic incinerator bed at a minimum of 475 degrees Fahrenheit, as well as conduct performance testing once during the term of this permit to demonstrate greater than 85% destruction efficiency, to ensure compliance with proper control techniques under 6 NYCRR Subpart 228. The facility is also required to operate proper maintenance techniques to minimize VOC emissions associated with these processes.

Fuel Supplier Certifications or bill of lading for all oil fuels stating sulfur in fuel content less than the specified limit below shall be supplied per delivery and be maintained on site for a period of five years, to demonstrate sulfur-in-fuel content below 1.5%.

Opacity shall be observed and maintained under specified limits.

Title V permitting requires the facility to submit semi-annual and annual compliance reports, including net HAP emissions, such that no individual HAP exceeds 9.75 tons per year emissions and total HAPs do not exceed 22.5 tons per year (In accordance with § 63.4281(b)).