New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-3828-00031/00019
Renewal Number: 1
Modification Number: 2 06/29/2011

Facility Identification Data
Name: SAINT GOBAIN PERFORMANCE PLASTICS
Address: 1 LIBERTY ST
HOOSICK FALLS, NY 12090

Owner/Firm
Name: SAINT-GOBAIN PERFORMANCE PLASTICS CORPORATION
Address: 150 DEY RD
WAYNE, NJ 07470, USA
Owner Classification: Corporation/Partnership

Permit Contacts
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Permit Description

Introduction

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

Summary Description of Proposed Project
The permit modification includes the installation of a new regenerative thermal oxidizer to achieve a required 90% reduction by weight of volatile organic compounds (VOC) being fed to the oxidizer.

Attainment Status

SAINT GOBAIN PERFORMANCE PLASTICS is located in the town of HOOSICK in the county of RENSSELAER.
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*	MARGINAL 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:
Saint Gobain Performance Plastic facility manufactures a variety of polytetrafluoroethylene (PTFE) film products, including extruded tapes, pressure sensitive adhesive tapes (PSAT), and thread-seal tapes. Products are manufactured on two types of process lines, extrusion and coating lines. The Liberty Street manufacturing facility is located on a 10.8 acre lot and is surrounded by a patchwork of undeveloped lands and residential areas. The building footprint is situated on the eastern half of the lot and occupies 55,200 square feet. Building consists of office space, warehouse and production space. The current building is a composite of a core U-shaped industrial structure (built 1948) with several renovations and additions, primarily a warehouse expansion within the U-shape. The facility operates on a one-floor level with the exception of a multi story pressure sensitive adhesive (PSAT) tower coaters A and B. Facility operations include a 3.9 MMBtu/hr boiler, two hot water heaters, two space heater boilers, and three process steam boilers. Emission points from the building include emissions from the three (3) thermal oxidizers, and a catalytic oxidizer, which are contained within two emission units. Facility operations included number of exempt units, including various extruders, two (2) air makeup units, solvent transfers, a solvent storage room, calendaring machine, and a heat set machine.

Permit Structure and Description of Operations
The Title V permit for SAINT GOBAIN PERFORMANCE PLASTICS
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.

SAINT GOBAIN PERFORMANCE PLASTICS is defined by the following emission unit(s):

Emission unit 3LEXTR - The extruded tape operations that consist of forming PTFE pills and extruding the pills into PTFE films. A petroleum distillate is used as a lubricant in the extrusion process. The PTFE films are produced on two extrusion lines; 12-inch and 16-inch lines. The films are calendered and heated via steam-heated rollers to volatilize the lubricant. The gas stream passes through a regenerative thermal oxidizer (primary) or catalytic oxidizer (backup) that exhausts to the atmosphere through a stacks to emission points EXTR1 for the catalytic oxidizer or EXTR2 for the regenerative thermal oxidizer. The two exempt process steam boilers provide steam for heating the roller cans.

Emission unit 3LEXTR is associated with the following emission points (EP):
EXTR1, EXTR2
Process: EXT is located at EXTRUDED TAPE - The extruded tape manufacturing operation involves PTFE fine powders are molded into pills and then extruded to form PTFE films. A naphtha solvent is used as a lubricant in the extruding process. Films are passed through steam-heated rollers that volatilize the lubricant. Vapor passes through a regenerative thermal oxidizer (primary) catalytic oxidizer (backup) and emissions enter the atmosphere from the stack associated with the respective control device.

Emission unit COATNG - Emission Unit C-OATNG will consist of several processes and three (3) thermal oxidizers associated with paper and other web coating.
Coating operations consist of Coaters A, B, C, D, and E; Towers A and B, where coatings are roll-coated and/or dip-coated. Coatings are subsequently cured onto substrates in ovens. VOC and HAP emissions from these coating lines are captured by permanent total enclosures and pass through one of the three permitted oxidizers.
Additionally, this EU shall include; paper and other web coating operations performed on Coater C using compliant coatings, mixing operations and, equipment used as a PTFE/fiberglass laminator. Emissions for these three operations are not controlled venting directly to the atmosphere.

Emission unit COATNG is associated with the following emission points (EP):
00001, 00002, E0002, E0003, E0004, E0005, PSAT2
Process: CCC is located at 1st Floor, Building LIBERTY - Frank W. Egan & Co. adhesive coater which is used to apply compliant coatings on paper and other web substrates. Emissions from the process are exhausted directly to the atmosphere.
Process: CLA is located at 1st Floor, Building LIBERTY - Pressure sensitive adhesive (PSA) tape proces conducted on Coater A. PSA's are applied to the substrate and cured in ovens. Emissions from the ovens pass through one of three thermal oxidizers prior to exhausting to atmosphere.

conducted on Coater B. PSA's are applied to the substrate and cured in ovens. Emissions from the ovens pass through one of three thermal oxidizers prior to exhausting to atmosphere.
Process: CLC is located at 1st Floor, Building LIBERTY - Frank W. Egan & Co. Adhesive Coater which is used to apply adhesive coatings on foam substrates. A solvent based release agent is applied to the film after the adhesive to prevent the tape from sticking to itself. Emissions from the ovens pass through one of three thermal oxidizers prior to exhausting to the atmosphere.
Process: CLD is located at 1st Floor, Building LIBERTY - Wolverine Corporation pressure sensitive adhesive tape coating line operated such that pressure sensitive adhesives are applied to a variety of substrates, which then pass through the dryers. Emissions from the ovens pass through one of three thermal oxidizers prior to exhausting to the atmosphere.
Process: CLE is located at 1st Floor, Building LIBERTY - Midland Ross Corp. Coater equipped with a 3-zone floater dryer. Bulk rolls of substrate are coated with solvent-based primers then adhesives on polymer film (70% silicone/30% acrylic). Emissions from the ovens pass through one of the three thermal oxidizers prior to exhausting to the atmosphere.
Process: LC1 is located at 1ST FLOOR, Building LIBERTY - Emission unit L-AMCAL consists of a piece of equipment used as a PTFE/fiberglass laminator.
Process: MIX is located at 1ST FLOOR, Building LIBERTY - Mixing room equipment associated with preparation of materials for use in Emission Units C-OATNG and C-OMPCT. Product mixing occurs within this area, with no emission control before venting to the atmosphere.
Process: TWA is located at 1st Floor, Building LIBERTY - Pressure sensitive adhesive tape process conducted on Tower A. PSA's are applied to the substrate and cured in ovens. Emissions from the ovens pass through one of the three thermal oxidizers prior to exhausting to the atmosphere.
Process: TWB is located at 1st Floor, Building LIBERTY - Glenro, Inc. vertical tower coater used in manufacturing of woven glass and other coated fabrics. emissions from the ovens pass through one of the three thermal oxidizers prior to exhausting to atmosphere.

Title V/Major Source Status
SAINT GOBAIN PERFORMANCE PLASTICS is subject to Title V requirements. This determination is based on the following information:
This facility is major due to the fact that their Potential to Emit emissions for HAP's Hazardous Air Pollutants 25 tons threshold combined, 10 tons threshold individual and VOC's Volatile Organic Compounds are above 50 tons.

Program Applicability
The following chart summarizes the applicability of SAINT GOBAIN PERFORMANCE PLASTICS 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)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES

TITLE VI	NO
RACT	YES
SIP	YES

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

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

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

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

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

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

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

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

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are

empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements.

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

SIC Code	Description
2281	YARN MILLS, EXCEPT WOOL
2295	COATED FABRICS, NOT RUBBERIZED
2672	PAPER COATED AND LAMINATED, NEC
3069	FABRICATED RUBBER PRODUCTS, NEC

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

SCC Code	Description
3-08-010-02	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISC PLASTIC PRODUCTS - PLASTIC PRODUCTS MANUFACTURING PLASTIC PRODUCTS MFG: EXTRUDER
4-02-044-35	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - FABRIC COATING, TRANSFER COATING LAMINATION: LAMINATING DEVICE
4-02-999-95	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS Specify in Comments Field
4-02-999-96	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS Specify in Comments Field

Facility Emissions Summary
In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to

Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE lbs/yr	PTE Range
000108-10-1	2-PENTANONE, 4-METHYL		> 0 but < 10 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER		> 0 but < 10 tpy
007664-41-7	AMMONIA		> 0 but < 2.5 tpy
000071-43-2	BENZENE		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
000067-64-1	DIMETHYL KETONE		>= 2.5 tpy but < 10 tpy
000111-96-6	ETHANE,1,1'-OXYBIS[-METHOXY]		> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE		>= 10 tpy
0NY100-00-0	HAP		>= 250 tpy but < 75,000 tpy
000110-54-3	HEXANE		> 0 but < 10 tpy
007664-39-3	HYDROGEN FLUORIDE		> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL		> 0 but < 10 tpy
000591-78-6	METHYL BUTYL KETONE		> 0 but < 2.5 tpy
000078-93-3	METHYL ETHYL KETONE		> 0 but < 10 tpy
000091-20-3	NAPHTHALENE		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 40 tpy but < 50 tpy
0NY075-00-5	PM-10		> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy
000108-88-3	TOLUENE		>= 10 tpy
0NY998-00-0	VOC		>= 250 tpy but < 75,000 tpy
001330-20-7	XYLENE, M, O & P MIXT.		>= 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.
(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

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

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation

or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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

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

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

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

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

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

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)
This Title V permit shall be reopened and revised under any of the following circumstances:

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

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the

emissions standards or other terms or conditions of the permit.

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

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

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.
Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a

permit.

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	111	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A.11	39	General provisions - compliance with standards and maintenance requirements
FACILITY	40CFR 60-A.12	40	General provisions - Circumvention
FACILITY	40CFR 60-A.13	41	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.14	42	General provisions - Modification
FACILITY	40CFR 60-A.15	43	General provisions - Reconstruction
FACILITY	40CFR 60-A.4	26	General provisions - Address
FACILITY	40CFR 60-A.7(a)	27	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(b)	28	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(c)	29	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(d)	30	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(e)	31	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(f)	32	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(g)	33	Notification and Recordkeeping
FACILITY	40CFR 60-A.8(a)	34	Performance Tests
FACILITY	40CFR 60-A.8(d)	35	Performance Tests
FACILITY	40CFR 60-A.8(e)	36	Performance Tests
FACILITY	40CFR 60-A.8(f)	37	Performance Tests
FACILITY	40CFR 60-A.9	38	General provisions - Availability of information
FACILITY	40CFR 60-RR.442(a)	44	Pressure Sensitive Tape and Label Surface Coating Operations - standard for VOC
FACILITY	40CFR 60-RR.443(a)	45	Pressure Sensitive

			Tape and Label Surface Coating Operations - compliance provisions
FACILITY	40CFR 60-RR.443(b)	46	Pressure Sensitive Tape and Label Surface Coating Operations - compliance provisions
FACILITY	40CFR 60-RR.443(d)	47	Pressure Sensitive Tape and Label Surface Coating Operations - compliance provisions
FACILITY	40CFR 60-RR.443(e)	49, 50, 1 -1	Pressure Sensitive Tape and Label Surface Coating Operations - compliance provisions
FACILITY	40CFR 60-RR.443(f)	51	Pressure Sensitive Tape and Label Surface Coating Operations - compliance provisions
FACILITY	40CFR 60-RR.443(g)	52	Pressure Sensitive Tape and Label Surface Coating Operations - compliance provisions
FACILITY	40CFR 60-RR.443(i)	53	Pressure Sensitive Tape and Label Surface Coating Operations - compliance provisions
FACILITY	40CFR 60-RR.443(j)	54	Pressure Sensitive Tape and Label Surface Coating Operations - compliance provisions
FACILITY	40CFR 60-RR.444(c)	55	Pressure Sensitive Tape and Label Surface Coating Operations - performance test procedures
FACILITY	40CFR 60-RR.445(a)	56	Pressure Sensitive Tape and Label Surface Coating Operations - monitoring of operations and recordkeeping
FACILITY	40CFR 60-RR.445(e)	57	Pressure Sensitive Tape and Label Surface Coating Operations - monitoring of operations and recordkeeping
FACILITY	40CFR 60-RR.445(g)	58	Pressure Sensitive Tape and Label Surface Coating Operations - monitoring of

			operations and recordkeeping
FACILITY	40CFR 60-RR.447	59	Pressure Sensitive Tape and Label Surface Coating Operations - reporting requirements
C-OATNG/-/TWB	40CFR 60-VVV.740(b)	107	Standards of performance for polymeric coating of supporting substrates facilities
C-OATNG/-/TWB	40CFR 60-VVV.744(b)	108	Standards of performance for polymeric coating of supporting substrates facilities - monitoring requirements
C-OATNG/-/TWB	40CFR 60-VVV.747(b)	109	Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
C-OATNG/-/TWB	40CFR 60-VVV.747(c)	110	Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
FACILITY	40CFR 63-JJJJ.3320(b)	61, 62	Paper and other Web Coating NESHAP - Emission Standard
FACILITY	40CFR 63-JJJJ.3320(b)(1	63	Paper and Other Web Coating NESHAP - Emission Standards - Organic HAP applied
FACILITY	40CFR 63-JJJJ.3330(a)	64	Compliance date for existing affected sources.
FACILITY	40CFR 63-JJJJ.3340	65	Paper and Other Web Coating NESHAP - General Requirements
FACILITY	40CFR 63-JJJJ.3350(c)(4	66	Paper and Other Web Coating NESHAP - Bypass line monitoring - automatic shutdown system option
FACILITY	40CFR 63-JJJJ.3350(f)	67	Paper and Other Web Coating NESHAP - Monitoring of capture systems
FACILITY	40CFR 63-JJJJ.3360(c)	68	Paper and Other Web Coating NESHAP - Determination of organic HAP content
FACILITY	40CFR 63-JJJJ.3360(d)	69	Paper and Other Web Coating NESHAP - Determination of volatile organic content and coating

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FACILITY	40CFR 63-JJJJ.3360(e)	70	Paper and Other Web Coating NESHAP - Performance tests to determine control device efficiency
FACILITY	40CFR 63-JJJJ.3360(f)	71	Paper and Other Web Coating NESHAP - Determination of capture efficiency
FACILITY	40CFR 63-JJJJ.3360(g)	72	Paper and Other Web Coating NESHAP - Determination of volatile matter retained in the coated web
FACILITY	40CFR 63-JJJJ.3370(b)	73	Paper and Other Web Coating NESHAP - Requirements for showing compliance
FACILITY	40CFR 63-JJJJ.3370(c)	74	Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials
FACILITY	40CFR 63-JJJJ.3370(d)	75	Paper and Other Web Coating NESHAP - Compliance determination for monthly allowable organic HAP applied option
FACILITY	40CFR 63-JJJJ.3370(e)	76	Paper and Other Web Coating NESHAP - Compliance Demonstration - 95/98% control option
FACILITY	40CFR 63-JJJJ.3370(f)	77	Paper and Other Web Coating NESHAP - Compliance demonstration - mass fraction of coating solids applied limit
FACILITY	40CFR 63-JJJJ.3370(g)	78	Paper and Other Web Coating NESHAP - compliance demonstration - mass fraction limit option
FACILITY	40CFR 63-JJJJ.3370(h)	79	Paper and Other Web Coating NESHAP - compliance demonstration - allowable emission rate option
FACILITY	40CFR 63-JJJJ.3370(n)	81, 82, 83, 85, 86, 1 -2, 1 -3	Paper and Other Web Coating NESHAP - determining compliance using combinations of capture and control
FACILITY	40CFR 63-JJJJ.3400(b)	87	Paper and Other Web Coating NESHAP - Reporting - Initial

			Notification
FACILITY	40CFR 63-JJJJ.3400(c)	88	Paper and Other Web Coating NESHAP - reporting - semiannual compliance report
FACILITY	40CFR 63-JJJJ.3400(d)	89	Paper and Other Web Coating NESHAP - reporting - Notification of Performance Test reports
FACILITY	40CFR 63-JJJJ.3400(e)	90	Paper and Other Web Coating NESHAP - Reporting - Notification of Compliance Status report
FACILITY	40CFR 63-JJJJ.3400(f)	91	Paper and Other Web Coating NESHAP - reporting - Performance test reports
FACILITY	40CFR 63-JJJJ.3400(g)	92	Paper and Other Web Coating NESHAP - reporting - startup/shutdown/malf unction reports
FACILITY	40CFR 63-JJJJ.3410	93	Paper and Other Web Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63-JJJJ.Tbl 2	60	Subpart A requirements for Subpart JJJJ
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	1 -4	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 94, 95	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	14	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2, 2 -1	General conditions Fees

FACILITY	6NYCRR 201-6.5(a)(8)	15	General conditions
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)	23	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	16	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	24	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7.1	25, 96	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18, 2 -3	Required emissions tests.
FACILITY	6NYCRR 202-2.1	6	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	7	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	2 -4	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	2 -7	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 211.3	19	General Prohibitions - visible emissions limited
3-LEXTR/-/EXT	6NYCRR 212.10(f)	98	NOx and VOC RACT required at major facilities
3-LEXTR/-/EXT	6NYCRR 212.3(a)	97	General Process Emission Sources - emissions from existing emission sources
C-OATNG/-/LC1	6NYCRR 212.6(a)	105	General Process Emission Sources - opacity of emissions limited
C-OATNG/-/MIX	6NYCRR 212.6(a)	106	General Process Emission Sources - opacity of emissions limited
3-LEXTR/EXTR1/EXT/EXT01	6NYCRR 212.9(b)	99, 100	General Process Emission Sources - tables
3-LEXTR/EXTR2/EXT/LEX02	6NYCRR 212.9(b)	2 -5, 2 -6	General Process Emission Sources - tables
FACILITY	6NYCRR 215	8	Open Fires
FACILITY	6NYCRR 215.2	2 -2	Open Fires - Prohibitions

C-OATNG	6NYCRR 228-1.1(b)(4)	101	Compliance upon start-up, table 1, Outside NYC & LOC metro
C-OATNG	6NYCRR 228-1.10	103	Handling, storage and disposal of VOCs
C-OATNG	6NYCRR 228-1.5(e)(2)	102	Demonstration of other than VOC solvent recovery
C-OATNG/-/CCC	6NYCRR 228-1.7	104	Table 1
FACILITY	6NYCRR 231-2	25	New Source Review in Nonattainment Areas and Ozone Transport Region

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

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

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

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

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

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

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

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for

a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

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

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

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

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

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

6 NYCRR 201-6.5 (c) (3)
This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and 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 (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 limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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 there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

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

Facility Specific Requirements
In addition to Title V, SAINT GOBAIN PERFORMANCE PLASTICS has been determined to be subject to the following regulations:

40 CFR 60.11
This regulation specifies the type of opacity monitoring requirements in relation to compliance with the standards and maintenance requirements.

40 CFR 60.12
This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

40 CFR 60.13
This regulation specifies how monitoring shall be performed and which methods and appendices are used to determine if the monitoring is adequate and in compliance with the regulated standards.

40 CFR 60.14
This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.

40 CFR 60.15
This regulation defines the term reconstruction and what is and is not considered to be a reconstruction project, for the purpose of rule applicability.

40 CFR 60.4
This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40 CFR 60.442 (a)
This limits emissions of VOCs and requires a per cent VOC emission reduction.

40 CFR 60.443 (a)
This establishes a VOC limit per unit of solids applied.

40 CFR 60.443 (b)
This determines how much overall VOC reduction is required.

40 CFR 60.443 (d)
This requires a monthly compliance determination and quarterly reports to be prepared.

40 CFR 60.443 (e)
This requiresl installation, calibration, maintaince, and operation of a monitoring device that continuously records the gas temperature upstream and downstream of the incinerator catalyst bed during coating operations. It also requires quarterly reports to be prepared.

40 CFR 60.443 (f)
This requires compliance be determined as the average emission reduction for one calendar month. It also requires testing at the end of each calendar month.

40 CFR 60.443 (g)
This requires that if a common emission control device is used to recover or destroy solvent from more than one affected facility, the performance of that control device is assumed to be equal for each of the affected facilities.

40 CFR 60.443 (i)
This determines compliance for common emission control devices.

40 CFR 60.443 (j)
This requires start ups and shut downs to be included in the compliance determination.

40 CFR 60.444 (c)
This prescribes the performance test methods for affected facilities controlled by a solvent destruction device.

40 CFR 60.445 (a)
This requires a calendar month record of all coatings used and the results of the reference test method used to determine compliance.

40 CFR 60.445 (e)
This requires thermal incineration solvent destruction devices to install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases.

40 CFR 60.445 (g)
This requires that if a solvent destruction device uses a hood or enclosure system to capture fugitive VOC emissions, a monitoring device shall be installed, calibrated, maintained, and operated to continuously indicate that the hood or enclosure system is operating.

40 CFR 60.447
This requires that performance test data and quarterly reports shall be submitted listing the exceedances

of the VOC emission limits. Reports also are to be submitted semi-annually .

40 CFR 60.7 (a)
This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

40 CFR 60.7 (b)
This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40 CFR 60.7 (c)
This requirement details the information to be submitted in excess emissions and monitoring systems performance reports which must be submitted at least semi-annually for sources with compliance monitoring systems.

40 CFR 60.7 (d)
This condition specifies the required information and format for a summary report form and details when either a summary form and/or excess emissions reports are required.

40 CFR 60.7 (e)
This condition specifies how sources that remain in continuous compliance, and are subject to monthly or quarterly reporting, can reduce reporting frequency to semiannually.

40 CFR 60.7 (f)
This condition specifies requirements for maintenance of files of all measurements, including continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40 CFR 60.7 (g)
This condition allows source owners to use reporting required for state or local agencies to satisfy the paragraph (a) reporting requirements of this section of this rule.

40 CFR 60.740 (b)
Applicability and designation of affected facility.

40 CFR 60.744 (b)
For owners of facilities that use less than 95 Mg of VOC per year they must make semiannual projected estimates of amount of VOC to be used and maintain records of actual VOC use for specified coating lines subject to the rule.

40 CFR 60.747 (b)
The facility must notify the anticipated startup of the coating line. They must report the material flow chart indicating projected VOC use and the actual VOC use at the end of the initial year.

40 CFR 60.747 (c)

The facility using less than 95 Mg per year shall record semiannual estimates of projected VOC use and actual 12-month VOC use, report the first semi-annual estimate in which the projected annual VOC use exceeds the annual cutoff and reportthe first 12-month period in which the actual VOC use exceeeds the applicable cutoff.

40 CFR 60.8 (a)
This regulation contains the requirements for the completion date and reporting of Performance Testing (stack testing), at the facility. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner or operator of the facility must conduct performance test(s) and furnish a written report of the test results.

40 CFR 60.8 (d)
This regulation contains the requirements for advance notification of Performance (stack) testing.

40 CFR 60.8 (e)
This regulation requires the facility to provide appropriate sampling ports, safe platforms and utilities as necessary for Performance (stack) testing.

40 CFR 60.8 (f)
This regulation requires that Performance (stack) tests consist of three runs unless otherwise specified. The rule also designates the allowable averaging methods for the analysis of the results.

40 CFR 60.9
This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

40 CFR 63.3320 (b)
This condition requires the owner or operator of the facility to reduce the emissions of hazardous air pollutants by 95%.

40 CFR 63.3320 (b) (1)
What emission standards must be meet? This regulation, paragraph requires that the affected source emit no more than 5% of the applied HAP for each month.

40 CFR 63.3330 (a)
The existing source must comply with this subpart by December 5, 2005. The facility must complete any preformance testing required within the time limits specified.

40 CFR 63.3340
The facility is required to have a startup, shutdown, and malfunction plan in place for affected sources using a control device to comply with the emission standards.

40 CFR 63.3350 (c) (4)
The facility must monitor and inspect each capture and control device to comply with subpart.

40 CFR 63.3350 (f)
The facility must develop a site specific monitoring plan for capture efficiency and determine parameters used to maintain that capture efficiency.

40 CFR 63.3360 (c)
If a facility determines compliance with the emission limits without the use of a control device then the

facility must calculate for all organic HAP the mass fraction for each coating material as purchased.

40 CFR 63.3360 (d)
If the facility determines compliance with the emission standards by other means than a control device then and the facility chooses to use the volatile organic content as a surrogate for the organic HAP content of the coatings. The facility must determine the as purchased volatile organic content and coating solids content of each coating material.

40 CFR 63.3360 (e)
If the facility has add on control equipment, the facility must determine the parameters used to establish operating limits to meet the emission limitations in this subpart.

40 CFR 63.3360 (f)
The facility must demonstrate compliance by meeting requirements for capture efficiency to ensure that all HAP laden air is being treated by the control device.

40 CFR 63.3360 (g)
The facility may choose to take into account the mass of volatile matter retained in the coated web after curing or drying or otherwise not emitted to the atmosphere. If the facility chooses this method they must provide a testing protocol to EPA for approval.

40 CFR 63.3370 (b)
The facility uses coating materials that individually meet the standards, they must show that for the month they fall below the thresholds specified in this subpart.

40 CFR 63.3370 (c)
If a facility is complying with the standards in this subpart the facility must demonstrate compliance using procedures in this rule.

40 CFR 63.3370 (d)
If the facility demonstrates compliance with this standard by using monthly allowable organic HAP applied option, they must demonstrate that the total monthly organic HAP applied is less than the calculated equivalent alowable organic HAP determined by the equations in this subpart.

40 CFR 63.3370 (e)
If the facility is using a capture and control device they must demonstrate that the overall organic HAP control efficiency is at least 95% for each month the outlet organic HAP concentration is less than 20 ppmv by compound on a dry basis as lond as capture efficiency is 100%.

40 CFR 63.3370 (f)
The facility must demonstrate compliance with the 0.20 kg organic HAP emitted/ kg of coating solids by operating a capture system and control device to achieve the limit.

40 CFR 63.3370 (g)
If the facility chooses to comply with the 0.04 kg organic HAP emitted / kg coating applied limit, the facililty must operate a capture system and control device to meet that limit.

40 CFR 63.3370 (h)
The facility must operate operate a capture system and control device to limit the monthly organic HAP emissions to less than the allowable emissions calculated within the accordance to this subpart.

40 CFR 63.3370 (n)
Parameters for the control devices must be established to demonstrate compliance with this subpart.

40 CFR 63.3400 (b)
Initial notification must be submitted.

40 CFR 63.3400 (c)
Timeline for scheduling compliance reports and what must be in the report when the report is completed.

40 CFR 63.3400 (d)
The facility must submit a notification of preformance test and a site specific test plan must be submitted to ensure the efficiency of the capture system and control devices.

40 CFR 63.3400 (e)
The facility must submit a notification of compliance status report.

40 CFR 63.3400 (f)
The facility must submit preformance test reports.

40 CFR 63.3400 (g)
The facility must submit a startup, shutdown, and malfunction procedure reports.

40 CFR 63.3410
The facilty must keep records for at least 5 years. Two of the years must be readily available and the remaining three years can be stored offsite or on a computer. This rule also articulates what specific information must be kept for the five years.

40 CFR 63.Tbl 2
This condition refers the applicant to the requirements of 40 CFR 63 Subpart A that are applicable to facilities subject to 40 CFR 63 Subpart JJJJ.

6 NYCRR 201-7.1
This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is a new source review cap of 72,000 lbs of VOC for specific processes and emission units at the facility.

6 NYCRR 211.1
This regulation describes the air pollution prhibited in the state.

6 NYCRR 212.10 (f)
Owners and/or operators must submit a RACT compliance plan with each application for a permit to construct and implement this plan when operation commences. A RACT analysis may not be required if emission levels fall below certain limits.

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

6 NYCRR 212.9 (b)
This section refers to Table 2 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions (Environmental Rating A or D) but excluding Volatile Organic Compound Emissions in the New York City Metropolitan Area.

6 NYCRR 228-1.1 (b) (4)
This citation requires all owners or operators of specified coating lines, located outside the New York City or Lower Orange County metropolitan areas, who's annual potential to emit volatile organic compounds is 10 tons or more, to be in compliance with the applicable regulations upon start-up of their operation.

6 NYCRR 228-1.10
This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6 NYCRR 228-1.5 (e) (2)
This citation specifies how to evaluate control equipment other than volatile organic compound (VOC)/ solvent recovery systems, and the methods to determine removal efficiency.

6 NYCRR 228-1.7
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 Subpart 231-2
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

Compliance Certification
Summary of monitoring activities at SAINT GOBAIN PERFORMANCE PLASTICS:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	29	record keeping/maintenance procedures
FACILITY	44	record keeping/maintenance procedures
FACILITY	45	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
FACILITY	1-1	monitoring of process or control device parameters as surrogate
FACILITY	49	monitoring of process or control device parameters

		as surrogate
FACILITY	50	monitoring of process or control device parameters as surrogate
FACILITY	51	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	57	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
C-OATNG/-/TWB	108	record keeping/maintenance procedures
C-OATNG/-/TWB	109	record keeping/maintenance procedures
C-OATNG/-/TWB	110	record keeping/maintenance procedures
FACILITY	61	record keeping/maintenance procedures
FACILITY	62	record keeping/maintenance procedures
FACILITY	63	record keeping/maintenance procedures
FACILITY	65	record keeping/maintenance procedures
FACILITY	66	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures
FACILITY	68	record keeping/maintenance procedures
FACILITY	69	record keeping/maintenance procedures
FACILITY	70	record keeping/maintenance procedures
FACILITY	71	record keeping/maintenance procedures
FACILITY	72	record keeping/maintenance procedures
FACILITY	73	work practice involving specific operations
FACILITY	74	record keeping/maintenance procedures
FACILITY	75	record keeping/maintenance procedures
FACILITY	76	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
FACILITY	78	record keeping/maintenance procedures
FACILITY	79	record keeping/maintenance procedures
FACILITY	1-2	monitoring of process or control device parameters as surrogate
FACILITY	1-3	intermittent emission testing
FACILITY	81	record keeping/maintenance procedures
FACILITY	82	monitoring of process or control device parameters as surrogate
FACILITY	83	monitoring of process or control device parameters as surrogate
FACILITY	85	intermittent emission testing
FACILITY	86	intermittent emission testing
FACILITY	87	record keeping/maintenance procedures
FACILITY	88	record keeping/maintenance procedures
FACILITY	89	record keeping/maintenance procedures
FACILITY	90	record keeping/maintenance procedures
FACILITY	91	record keeping/maintenance procedures
FACILITY	92	record keeping/maintenance procedures
FACILITY	93	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	6	record keeping/maintenance procedures
3-LEXTR/-/EXT	98	record keeping/maintenance procedures
C-OATNG/-/LC1	105	monitoring of process or control device parameters as surrogate
C-OATNG/-/MIX	106	monitoring of process or control device parameters as surrogate
3-LEXTR/EXTR1/EXT/EXT01	99	intermittent emission testing
3-LEXTR/EXTR1/EXT/EXT01	100	monitoring of process or control device parameters as surrogate

3-LEXTR/EXTR2/EXT/LEX02	2-5	monitoring of process or control device parameters as surrogate
3-LEXTR/EXTR2/EXT/LEX02	2-6	intermittent emission testing
C-OATNG	101	record keeping/maintenance procedures
C-OATNG	103	record keeping/maintenance procedures
C-OATNG/-/CCC	104	work practice involving specific operations

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Basis for Monitoring

This facility is an existing major source defined by 6 NYCRR 201. The facility is also subject to 6 NYCRR Parts 200, 201, 211, 215, 228, 40 CFR 63-JJJJ, 40 CFR 60-RR, 40 CFR 60-VVV. Monitoring of the facility is required to demonstrate compliance with the above mentioned regulations.

Monitoring may be of the following types: continuous, intermittent, work practices, monitoing of a parameter of a work process, and recordkeeping in accordance with the rules.