New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-4228-00076/00117
Renewal Number: 1
02/11/2010

Facility Identification Data
Name: VON ROLL USA INC
Address: 200 VON ROLL DR
SCHENECTADY, NY 12306

Owner/Firm
Name: VON ROLL USA INC
Address: 200 VON ROLL DR
SCHENECTADY, NY 12306-2496, 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
Renewal of Title V and integration of MACT standards for 40 CFR 63 Subpart JJJJ Paper and other Web Coating.

Attainment Status

VON ROLL USA INC is located in the town of ROTTERDAM in the county of SCHENECTADY. 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:
The Riverview facility at 200 Von Roll Drive is primarily engaged in the manufacture of electrical insulating and related materials. The solids manufacturing is based in building RV14 where surface coating operations coat or impregnate glass cloth, fibers, mineral mica and other materials. Building RV14 also houses other support operations. The liquids manufacturing is primarily based in Building RV33 where varnishes (reacted and blended), intermediates and related materials are manufactured for application in the solids area or shipped offsite. The facility has additional buildings for supporting operations and administrative functions.

Permit Structure and Description of Operations
The Title V permit for VON ROLL USA 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
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

VON ROLL USA INC is defined by the following emission unit(s):

Emission unit 114CC1 - Rv14 Compliant Coating Lines: Includes emissions from two surface coating lines, the Kiss Coater and 1531 Hot Melt Treater (EP 12009 serves the Kiss Coater and EP 12023 serves both Treaters), which treat substrates with low volatile coatings. The small and large batch ovens (EP 12021 and 12022, respectively) are used to cure the materials manufactured on the treaters and are, therefore, part of this emission unit. Unit includes fugitive emissions from the Kiss Coater and the Hot Melt plus the emissions from the natural gas fired in the ovens. Permit based on operation with compliant coatings only(<2.9 lb VOC/gal and non-HAP VOCs).

Emission unit 114CC1 is associated with the following emission points (EP):
12009, 12021, 12022, 12023
Process: CC1 is located at FIRST FLOOR, Building RV14 - Compliant coatings (Low Volatile Coatings <2.9 lb VOC/gal and non-HAP) used at the treaters in EU 1-14CC1 Kiss Coater and 1531 Hot Melt Treater, including the Small and Large Batch Ovens). Also see FB-2 for fuel burning associated with the ovens.
Process: FB2 is located at FIRST FLOOR, Building RV14 - Natural Gas Burning associated with EU 1-14CC1 (Small and Large Batch Ovens).

Emission unit 114NC1 - RV14 Primary Non-compliant Coating Lines: includes all the emissions from five surface coating lines (Laminator, 1040 Treater, Vertical Towers 1 & 2). See supporting document Attachment C for a further discussion of this emission unit. Unit includes any fugitive emissions, emissions from the natural gas fired in the treater ovens and the fuel used in the OX1 thermal oxidizer to maintain the operating temperature. Coating lines can also operate based on the use of compliant coatings (<2.9 lb VOC/gal and non-HAP) at which time the process does not require control equipment.

Emission unit 114NC1 is associated with the following emission points (EP):
12006, 12007, 12008, 12012, 12013, 12017, 12039, 12040, 12041, 12042, 12044
Process: CC2 is located at FIRST FLOOR, Building RV14 - Complaint coatings (low volatile coatings, <2.9 lb VOC/gal and non-HAP) on the treaters in EU 1-14NC1 including the following processes: 1040 Treater, Laminator and Vertical Towers 1 & 2.
Process: FB1 is located at FIRST FLOOR, Building RV14 - Natural gas fuel burning associated with EU 1-14NC1 (the four coating line ovens and the fuel used to maintain the temperature of the OX1 Thermal Oxidizer).
Process: NC1 is located at FIRST FLOOR, Building RV14 - All 4 surface coating lines associated with EU 1-14NC1 are batch operations employing a wide variety of non-compliant coatings (>2.9 lb VOC/gal. and HAP volatiles). Process includes all VOCs in the coating systems and in any solvents used. Also see FB1 for fuel burning from this source.

Emission unit 114NC2 - RV14 Secondary Non-compliant Coating Lines: includes all the emissions from two surface coating lines (1196 Treater with the Reverse Roll Coater and 1050 Treater). See supporting document Attachment C for a further discussion of this emission unit. Unit includes the sodium hydroxide from the 1196 Treater belt direr, and emissions from the natural gas fired in the 1196 Treater ovens, belt drier and the fuel used in the oxidizer to maintain the operating temperature. Coating lines can also be operated based on the use of compliant coatings (<2.9 lb VOC/gal per NYCRR Part 228, non-HAP and the 1050 Treater waterborne coatings consistent with new source standard 40 CFR 60 Subpart VVV) at which time the process does not require control equipment.

Emission unit 114NC2 is associated with the following emission points (EP):
12002, 12003, 12004, 12005, 12038, 12043, 12045, 12046, 12047

Process: BD1 is located at 1196 Pit, Building RV14 - 1196 ATreater Belt Drier is part of the process into the coating section of the treater.
Process: CC3 is located at FIRST FLOOR, Building RV14 - Compliant coatings (low volatile coatings <2.9 lb voc/gal consistent with NYCRR Part 228 and 1050 Treater waterborne coatings consistent with 40 CFR Subpart VVV) on the treaters in EU 1-14NC2 including the following processes: 1196 Treater, Reverse Roll Coater and 1050 Treater.
Process: FB3 is located at FIRST FLOOR, Building RV14 - Natural gas fuel burning associated with EU 1-14NC2 (the 1196 Treater ovens and the fuel used to maintain the temperature of the Thermal Oxidizer OX2).
Process: NC2 is located at FIRST FLOOR, Building RV14 - All surface coating lines associated with EU 1-14NC2 are batch operations employing a wide variety of non-compliant coatings (>2.9 lb VOC/gal and HAP volatiles). Process includes all VOCs in the coating systems and in any solvents used. Also see FB3 for fuel burning from this source.

Emission unit 114SL1 - RV14 Slitter/Packing Ventilation (EPN 12015, 12018, 12019, 12020) and a Mica Dust Knockout Unit (EPN 12035) includes the emissions from the slitters used to cut the materials produced on the treaters into various widths and the associated Packing Areas. Includes ventilation emission from the new RV14 drum compactor for compacting scrap tape and other materials.

Emission unit 114SL1 is associated with the following emission points (EP):
12015, 12018, 12019, 12020, 12035
Process: SLD is located at FIRST FLOOR, Building RV14 - Slitter Ventilation at slitter D picks up edge trimmings from master rolls containing mica dust lost by the processing of master roll to tape roll by slitting and packaging.
Process: SLV is located at FIRST FLOOR, Building RV14 - Slitter Ventilation picks up trace amounts of volatiles lost by the processing of master roll to tape roll by slitting and packaging.

Emission unit 133001 - RV33 Misc. General Processes: currently includes the emissions from reactor and mixing operations in building RV33 (including the outdoors storage tank M-9). Iincludes a future outdoor storage tank M-21.

Emission unit 133001 is associated with the following emission points (EP):
12100, 12101, 12102, 12103, 12104, 12105, 12106, 12107, 12108, 12109, 12110, 12112, 12113, 12122, 12123, 12124, 12126, 12127, 12130, 12131, 12132, 12133, 12139, 12140, 12141, 12142, 12143, 12144, 12145, 12146, 12147, 12148, 12149, 12150, 12151, 12152, 12153, 12154, 12155, 12156, 12157, 12158, 12159, 12160
Process: 33A is located at FIRST FLOOR, Building RV33 - Reactor and mixing processes located in building RV33 used primarily for the manufacture and formulation of resins and varnishes.

Emission unit 142001 - RV42 Hazordous Waste Drum Compactor: Includes the emissions from the ventilationof the drum compactor.

Emission unit 142001 is associated with the following emission points (EP):
12304
Process: DRM is located at FIRST FLOOR, Building RV42 - Volatiles lost during the compacting of drums of scrap material prior to shipment offsite.

Title V/Major Source Status
VON ROLL USA INC is subject to Title V requirements. This determination is based on the following information:
This facility is major for VOC emissions.major_src_status

Program Applicability
The following chart summarizes the applicability of VON ROLL USA 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)	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
2295	COATED FABRICS, NOT RUBBERIZED
2821	PLASTICS MATERIALS AND RESINS
2851	PAINTS AND ALLIED PRODUCTS
3299	NONMETALLIC MINERAL PRODUCTS

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

SCC Code	Description
3-99-900-03	MISCELLANEOUS MANUFACTURING INDUSTRIES

	MISCELLANEOUS MANUFACTURING INDUSTRIES NATURAL GAS: PROCESS HEATERS
3-99-999-99	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES SEE COMMENT **
4-02-010-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - COATING OVEN HEATER Natural Gas
4-02-999-95	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	Range
000092-52-4	1, 1 BIPHENYL		> 0 but < 10 tpy
000121-91-5	1, 3-BENZENEDICARBOXYLIC ACID		> 0 but < 2.5 tpy
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER		> 0 but < 10 tpy
000120-80-9	1,2-BENZENEDIOL		> 0 but < 10 tpy
000098-29-3	1,2-BENZENEDIOL, 4-(1,1-DIMETHYLETHYL)-		> 0 but < 2.5 tpy
000110-18-9	1,2-ETHANEDIAMINE, N,N,N',N',-TETRAMETHYL-		> 0 but < 2.5 tpy
000107-21-1	1,2-ETHANEDIOL		> 0 but < 10 tpy
000108-38-3	1,3 DIMETHYL BENZENE		>= 10 tpy
000100-97-0	1,3,5,7-ETRAAZATRICYCLO(3.3.1.13,7)DECANE (9CI)		> 0 but < 2.5 tpy
000839-90-7	1,3,5-TRIAZINE-2,4,6(1H,3H,5H)-TRIONE,1,3,5-TRIS(2-HYDROXY)		> 0 but < 2.5 tpy
001087-21-4	1,3-BENZENECARBOXILIC		> 0 but < 2.5 tpy

	ACID, DI-2-PROPENYL ESTER	
000495-54-5	1,3-BENZENEDIAMINE, 4-(PHENYLAZO)-	> 0 but < 2.5 tpy
000108-46-3	1,3-BENZENEDIOL	> 0 but < 2.5 tpy
000085-44-9	1,3-ISOBENZOFURANDIONE	> 0 but < 10 tpy
000126-30-7	1,3-PROPANEDIOL, 2,2-DIMETHYL-	> 0 but < 2.5 tpy
000115-77-5	1,3-PROPANEDIOL,2,2-BIS(HYDROXYMETHYL)-(9CI)	> 0 but < 2.5 tpy
000100-21-0	1,4-BENZENEDICARBOXYLIC ACID	> 0 but < 2.5 tpy
000123-31-9	1,4-BENZENEDIOL	> 0 but < 10 tpy
001948-33-0	1,4-BENZENEDIOL, 2-(1,1-DIMETHYLETHYL)-	> 0 but < 2.5 tpy
000088-58-4	1,4-BENZENEDIOL, 2,5-BIS(1,1-DIMETHYLETHYL)-	> 0 but < 2.5 tpy
000123-91-1	1,4-DIETHYLENE DIOXIDE	> 0 but < 10 tpy
001653-40-3	1-HEPTANOL, 6-METHYL	> 0 but < 2.5 tpy
000104-76-7	1-HEXANOL, 2-ETHYL	> 0 but < 2.5 tpy
000872-50-4	1-METHYL-2-PYRROLIDONE	> 0 but < 2.5 tpy
000108-03-2	1-NITROPROPANE	> 0 but < 2.5 tpy
000098-86-2	1-PHENYLETHANONE	> 0 but < 10 tpy
000111-77-3	2-(2-METHOXYETHOXY)-ETHANOL	> 0 but < 10 tpy
000102-71-6	2,2,2-NITRILOTRIS ETHANOL	> 0 but < 2.5 tpy
000105-67-9	2,4 XYLENOL	> 0 but < 2.5 tpy
000837-08-1	2,4'-BISPHENOL A	> 0 but < 2.5 tpy
000108-31-6	2,5 - FURANDIONE	> 0 but < 10 tpy
025377-73-5	2,5-FURANDIONE, 3-(DODECENYL)DIHYDRO-	> 0 but < 2.5 tpy
000141-43-5	2-AMINOETHANOL	> 0 but < 2.5 tpy
001338-23-4	2-BUTANONE PEROXIDE	> 0 but < 2.5 tpy
000096-29-7	2-BUTANONE, OXIME	> 0 but < 2.5 tpy
000624-48-6	2-BUTENEDOIC ACID (Z)-, DIMETHYL ESTER	> 0 but < 2.5 tpy
000078-59-1	2-CYCLOHEXEN-1-ONE,3,5,5-TRIMETHYL	> 0 but < 10 tpy
000108-01-0	2-DIMETHYL AMINO ETHANOL	> 0 but < 2.5 tpy
000149-57-5	2-ETHYLHEXANOIC ACID	> 0 but < 2.5 tpy
001589-47-5	2-METHOXY-1-PROPANOL	> 0 but < 2.5 tpy
070657-70-4	2-METHOXY-1-PROPANOL ACETATE	> 0 but < 2.5 tpy
000095-48-7	2-METHYL-PHENOL	> 0 but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL	>= 10 tpy
000107-98-2	2-PROPANOL, 1-METHOXY	>= 50 tpy but < 100 tpy
000108-65-6	2-PROPANOL, 1-METHOXY-, ACETATE	> 0 but < 2.5 tpy
009003-18-3	2-PROPENENITRILE, POLYMER W/ 1,3, BUTADIENE	> 0 but < 2.5 tpy
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER	> 0 but < 10 tpy
000101-77-9	4,4'-DIAMINODIPHENYLMETHANE	> 0 but < 10 tpy
000077-73-6	4,7 METHANO-1H-INDENE, 3A,4,7,7A-TETRAHYDRO-	>= 2.5 tpy but < 10 tpy

000123-42-2	4-HYDROXY-4-METHYL-2-PENTANONE	> 0 but < 2.5 tpy
000075-07-0	ACETALDEHYDE	> 0 but < 10 tpy
000064-19-7	ACETIC ACID	> 0 but < 2.5 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER	> 0 but < 10 tpy
063450-15-7	ACETIC ACID ETHENYL ESTER, POLYMER	> 0 but < 2.5 tpy
009003-20-7	ACETIC ACID ETHENYLESTER, HOMOPOLYMER	> 0 but < 2.5 tpy
027360-07-2	ACETIC ACID ETHYENYL ESTER, POLYMER	> 0 but < 2.5 tpy
000123-86-4	ACETIC ACID, BUTYL ESTER	> 0 but < 2.5 tpy
000079-20-9	ACETIC ACID, METHYL ESTER	>= 2.5 tpy but < 10 tpy
000074-86-2	ACETYLENE	> 0 but < 2.5 tpy
000107-02-8	ACROLEIN	> 0 but < 10 tpy
009019-92-5	ADIPIC ACID-ETHYLENE GLYCOL-TDI POLYMER	> 0 but < 2.5 tpy
013963-57-0	ALUMINUM ACETYLACETONATE	> 0 but < 2.5 tpy
021645-51-2	ALUMINUM HYDROXIDE	> 0 but < 2.5 tpy
007664-41-7	AMMONIA	> 0 but < 2.5 tpy
007631-86-9	AMORPHOUS SILICA	> 0 but < 10 tpy
000062-53-3	ANILINE	> 0 but < 10 tpy
016925-25-0	ANTIMONATE(1-), HEXAFLUORO-, SODIUM	> 0 but < 10 tpy
007440-38-2	ARSENIC	> 0 but < 10 tpy
000071-43-2	BENZENE	> 0 but < 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL)	> 0 but < 10 tpy
001746-23-2	BENZENE, 1-(1,1-DIMETHYLETHYL)-4-ETHENYL	> 0 but < 2.5 tpy
000095-63-6	BENZENE, 1,2,4-TRIMETHYL-	>= 25 tpy but < 40 tpy
000091-08-7	BENZENE, 1,3 DIISOCYANATO-2-METHYL	> 0 but < 2.5 tpy
000108-67-8	BENZENE, 1,3,5-TRIMETHYL-	> 0 but < 2.5 tpy
026471-62-5	BENZENE, 1,3-DIISOCYANATOMETHYL	> 0 but < 2.5 tpy
000584-84-9	BENZENE, 2,4-DIISOCYANATO-1-METHYL-	> 0 but < 10 tpy
001321-74-0	BENZENE, DIETHENYL-	> 0 but < 2.5 tpy
025340-17-4	BENZENE, DIETHYL-	> 0 but < 2.5 tpy
028106-30-1	BENZENE, ETHENYLETHYL-	> 0 but < 2.5 tpy
000095-47-6	BENZENE,1,2-DIMETHYL	>= 10 tpy
000614-45-9	BENZENECARBOPEROXOI CACID,1,1-DIMETHYLETHYLESTER	> 0 but < 2.5 tpy
000103-83-3	BENZENEMETHANAMIDE, N,N-DIMETHYL	> 0 but < 2.5 tpy
025036-25-3	BISPHENOL A, BISPHENOL A DGE POLYMER	> 0 but < 2.5 tpy
025085-75-0	BISPHENOL A, FORMALDEHYDE RESIN	> 0 but < 2.5 tpy
034762-90-8	BORON, TRICHLORO 9N,N-DIMETHYL-1-OCTANAMINE)-	> 0 but < 2.5 tpy

000123-72-8	BUTANAL	> 0 but < 2.5 tpy
000106-65-0	BUTANEDIOIC ACID, DIMETHYL ESTER	> 0 but < 2.5 tpy
000110-63-4	BUTANEDIOL, 1,4-	> 0 but < 2.5 tpy
000071-36-3	BUTANOL	>= 2.5 tpy but < 10 tpy
000110-17-8	BUTENEDIOIC ACID, 2-	> 0 but < 2.5 tpy
011099-03-9	C.I. SOLVENT BLACK 5	> 0 but < 2.5 tpy
000133-06-2	CAPTAN	> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 25 tpy but < 40 tpy
000108-32-7	CARBONIC ACID, CYCLIC PROPYLENE ESTER	> 0 but < 2.5 tpy
067700-42-9	CASHEW, NUTSHELL OIL POLYMER W/ FORMALDEHYDE & PHENOL	> 0 but < 2.5 tpy
068604-06-8	CASTOR OIL, POLYMER W/ ETHYLENEDIAMINE	> 0 but < 2.5 tpy
007440-50-8	COPPER	> 0 but < 2.5 tpy
001319-77-3	CRESYLIC ACID	> 0 but < 10 tpy
000110-82-7	CYCLOHEXANE	> 0 but < 2.5 tpy
000108-94-1	CYCLOHEXANONE	> 0 but < 2.5 tpy
000131-17-9	DIALLYL PHTHALATE	> 0 but < 2.5 tpy
000075-09-2	DICHLOROMETHANE	> 0 but < 10 tpy
002386-87-0	DICYCLODIEPOXY CARBOXYLATE	> 0 but < 2.5 tpy
002425-79-8	DIEPOXIDE	> 0 but < 2.5 tpy
068334-30-5	DIESEL FUEL	> 0 but < 2.5 tpy
026254-89-7	DIETHYL BUTYRAL	> 0 but < 2.5 tpy
000111-40-0	DIETHYLENE TRIAMINE	> 0 but < 2.5 tpy
000096-48-0	DIHYDRO 2(3H)-FURANONE	> 0 but < 2.5 tpy
000131-11-3	DIMETHYL PHTHALATE	> 0 but < 10 tpy
000067-64-1	DIMETHYL KETONE	>= 100 tpy but < 250 tpy
000120-61-6	DIMETHYLTEREPHTHALATE	> 0 but < 2.5 tpy
000126-58-9	DIPENTAERYTHRITOL	> 0 but < 2.5 tpy
034590-94-8	DIPROPYLENE GLYCOL METHYL ETHER	> 0 but < 2.5 tpy
041638-13-5	DIPROPYLENE GYLCOL DIGLYCIDYL ETHER	> 0 but < 2.5 tpy
002155-71-7	DI-T-BUTYL DIPEROXYPHTHALATE	> 0 but < 2.5 tpy
000079-24-3	ETHANE, NITRO-	> 0 but < 2.5 tpy
000111-90-0	ETHANOL, 2- (2-ETHOXYETHOXY)	> 0 but < 10 tpy
000112-34-5	ETHANOL, 2-(2-BUTOXYETHOXY)-	> 0 but < 10 tpy
000111-42-2	ETHANOL, 2,2'-IMINOBIS-	> 0 but < 10 tpy
000111-46-6	ETHANOL, 2,2'-OXYBIS-	> 0 but < 2.5 tpy
000111-76-2	ETHANOL, 2-BUTOXY-	> 0 but < 10 tpy
000112-07-2	ETHANOL, 2-BUTOXY-, ACETATE	> 0 but < 10 tpy
000111-15-9	ETHANOL, 2-ETHOXY-, ACETATE	> 0 but < 10 tpy
000124-17-4	ETHANOL,2(2-BUTOXYETHOXY)-,ACETATE	> 0 but < 10 tpy
000112-27-6	ETHANOL,2,2'- 1,2-ETHANEDIYLBIS(OXY) BIS	> 0 but < 10 tpy
068441-17-8	ETHENE, HOMOPOLYMER, OXIDIZED	> 0 but < 2.5 tpy
025013-15-4	ETHENYLMETHYL-BENZENE	> 0 but < 2.5 tpy
000077-99-6	ETHRIOL	> 0 but < 2.5 tpy

000141-78-6	ETHYL ACETATE	> 0 but < 2.5 tpy
000064-17-5	ETHYL ALCOHOL (ETHANOL)	>= 100 tpy but < 250 tpy
000075-23-0	ETHYLAMINE,COMPD WITH BORON FLUORIDE (BF3) (1:1)	> 0 but < 2.5 tpy
000100-41-4	ETHYLBENZENE	>= 10 tpy
000075-21-8	ETHYLENE OXIDE	> 0 but < 10 tpy
068953-36-6	FATTY ACIDS, REACTION PRODUCTS W/ TETRAETHYLENEPENTAMINE	> 0 but < 2.5 tpy
0NY075-20-0	FINE MINERAL FIBERS	> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE	> 0 but < 10 tpy
028453-20-5	FORMALDEHYDE, POLYMER W/ PHENOL	> 0 but < 2.5 tpy
000064-18-6	FORMIC ACID	> 0 but < 2.5 tpy
068476-30-2	FUEL OIL #2	> 0 but < 2.5 tpy
000098-00-0	FURFURYL ALCOHOL	> 0 but < 2.5 tpy
008006-61-9	GASOLINE	> 0 but < 2.5 tpy
065997-17-3	GLASS OXIDE	> 0 but < 2.5 tpy
001119-40-0	GLUTARIC ACID, DIMETHYL ESTER	> 0 but < 2.5 tpy
000056-81-5	GLYCEROL	> 0 but < 2.5 tpy
007782-42-5	GRAPHITE	> 0 but < 2.5 tpy
008050-09-7	GUM ROSIN	> 0 but < 2.5 tpy
0NY100-00-0	HAP	>= 250 tpy
000085-42-7	HEXAHYDRO PHTHALIC ANHYDRIDE	> 0 but < 2.5 tpy
000110-54-3	HEXANE	>= 10 tpy
000124-04-9	HEXANEDIOIC ACID	> 0 but < 2.5 tpy
000627-93-0	HEXANEDIOIC ACID, DIMETHYL ESTER	> 0 but < 2.5 tpy
026523-14-8	HEXANEDIOIC ACID, POLYMER W. 1,2 ETHANEDIOL	> 0 but < 2.5 tpy
000136-52-7	HEXANOIC ACID, 2-ETHYL COBALT 2+	> 0 but < 10 tpy
000074-90-8	HYDROCYANIC ACID	> 0 but < 10 tpy
007647-01-0	HYDROGEN CHLORIDE	> 0 but < 10 tpy
007722-84-1	HYDROGEN PEROXIDE	> 0 but < 2.5 tpy
007681-52-9	HYPOCHLOROUS ACID, SODIUM SALT	> 0 but < 2.5 tpy
001309-37-1	IRONOXIDE (FERRIC OXIDE)	> 0 but < 2.5 tpy
000078-83-1	ISOBUTYL ALCOHOL	> 0 but < 2.5 tpy
026952-21-6	ISOOCTANOL	> 0 but < 2.5 tpy
000067-63-0	ISOPROPYL ALCOHOL	>= 50 tpy but < 100 tpy
008008-20-6	KEROSENE	>= 50 tpy but < 100 tpy
007439-92-1	LEAD	> 0 but < 10 tpy
001317-65-3	LIMESTONE	> 0 but < 2.5 tpy
007439-96-5	MANGANESE	> 0 but < 10 tpy
000105-08-8	METHANOL, 1,4-CYCLOHEXANEDI-	> 0 but < 2.5 tpy
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER	> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL	> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE	>= 10 tpy
000101-68-8	METHYLENE BISPHENYL ISOCYANATE	> 0 but < 10 tpy
000057-55-6	METHYLETHYL GLYCOL	> 0 but < 2.5 tpy
012001-26-2	MICA	> 0 but < 2.5 tpy
000121-44-8	N,N-DIETHYL ETHANAMINE	> 0 but < 10 tpy

064742-53-6	NAPHTHA (PETROLEUM) HYDROTREATED LIGHT	> 0 but < 2.5 tpy
064741-65-7	NAPHTHA (PETROLEUM), HEAVY ALKYLATE	>= 2.5 tpy but < 10 tpy
064741-41-9	NAPHTHA (PETROLEUM), HEAVY STRAIGHT-RUN	> 0 but < 2.5 tpy
064742-94-5	NAPHTHA HEAVY AROMATIC	> 0 but < 2.5 tpy
064742-95-6	NAPHTHA, LIGHT AROMATIC	>= 100 tpy but < 250 tpy
064742-88-7	NAPHTHA, MEDIUM ALIPHATIC	>= 40 tpy but < 50 tpy
000091-20-3	NAPHTHALENE	> 0 but < 10 tpy
008030-30-6	NAPTHA	> 0 but < 2.5 tpy
064742-48-9	NAPTHA HEAVY HYDROTREATED (PETROLEUM)	> 0 but < 2.5 tpy
000142-82-5	N-HEPTANE	>= 10 tpy but < 25 tpy
012710-36-0	NICKEL CARBIDE	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	> 0 but < 10 tpy
001313-99-1	NICKEL OXIDE	> 0 but < 10 tpy
007697-37-2	NITRIC ACID	> 0 but < 2.5 tpy
005575-43-9	OCTYLENE GYLCOL, TITANATE (IV)	> 0 but < 2.5 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 25 tpy but < 40 tpy
000106-89-8	OXIRANE, (CHLOROMETHYL)	> 0 but < 10 tpy
002238-07-5	OXIRANE, 2,2'-OXYBIS(METHYLENENE) BIS-	> 0 but < 2.5 tpy
002426-08-6	OXIRANE,(BUTOXYMETHYL)- (9CI)	> 0 but < 2.5 tpy
002210-79-9	OXIRANE,[(2-METHYLPHENOXY),METHYL]	> 0 but < 2.5 tpy
003101-60-8	OXIRANE,[[4-(1,1-DIMETHYLETHYL)PHENOXY]METHYL]	> 0 but < 2.5 tpy
010028-15-6	OZONE	> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES	>= 10 tpy but < 25 tpy
006228-26-8	PENTAERYTHRITOL LINEAR FORMAL	> 0 but < 2.5 tpy
000112-57-2	PENTAMINE, TETRAETHYLENE	> 0 but < 2.5 tpy
000080-43-3	PEROXIDE , BISIIMETHYL-1-PHENYLETHYL	> 0 but < 2.5 tpy
000094-36-0	PEROXIDE, DIBENZOYL	> 0 but < 2.5 tpy
000108-95-2	PHENOL	>= 10 tpy
068610-56-0	PHENOL 4,4'-(1-METHYLETHYLIDENE)BIS-, POLYMER	> 0 but < 2.5 tpy
000108-39-4	PHENOL, 3-METHYL	> 0 but < 10 tpy
000080-46-6	PHENOL, 4-(1,1-DIMETHYLPROPYL)-	> 0 but < 2.5 tpy
000080-05-7	PHENOL, 4,4'-(1-METHYLETHYLIDENE)BIS-	> 0 but < 2.5 tpy
000150-76-5	PHENOL, 4-METHOXY-	> 0 but < 2.5 tpy
000106-44-5	PHENOL, 4-METHYL	> 0 but < 10 tpy
001300-71-6	PHENOL, DIMETHYL-	> 0 but < 2.5 tpy
025429-37-2	PHENOL, EHTYL-	> 0 but < 2.5 tpy
028064-14-4	PHENOL, POLYMER WITH FORMALDEHYDE, GLYCIDYL ETHER	> 0 but < 2.5 tpy

026998-80-1	PHENOL, TRIMETHYL	> 0 but < 2.5 tpy
009003-35-4	PHENOL,POLYMER WITH FORMALDEHYDE MIX	> 0 but < 2.5 tpy
025068-38-6	PHENOXY RESIN	> 0 but < 2.5 tpy
017084-13-8	PHOSPHATE(1-), HEXAFLUORO-, POTASIUM	> 0 but < 2.5 tpy
007664-38-2	PHOSPHORIC ACID	> 0 but < 2.5 tpy
000078-40-0	PHOSPHORIC ACID, TRIETHYL ESTER	> 0 but < 2.5 tpy
000101-02-0	PHOSPHORUS ACID,TRIPHENYL ESTER	> 0 but < 2.5 tpy
0NY075-00-5	PM-10	>= 10 tpy but < 25 tpy
025322-68-3	POLYETHYLENE GLYCOL	> 0 but < 2.5 tpy
009003-53-6	POLYSTYRENE	> 0 but < 2.5 tpy
063148-64-1	POLYVINYL FORMAL RESIN	> 0 but < 2.5 tpy
007789-23-3	POTASSIUM FLUORIDE	> 0 but < 2.5 tpy
000075-56-9	PROPANE, 1,2-EPOXY-	> 0 but < 10 tpy
000079-46-9	PROPANE, 2-NITRO	> 0 but < 10 tpy
000122-60-1	PROPANE,1,2-EPOXY-3-PHENOXY-	> 0 but < 2.5 tpy
000071-23-8	PROPANOL	>= 10 tpy but < 25 tpy
025265-71-8	PROPANOL, OXYBIS	> 0 but < 2.5 tpy
000107-13-1	PROPENENITRILE	> 0 but < 10 tpy
000103-11-7	PROPENOIC ACID, 2-ETHYLHEXYL ESTER	>= 100 tpy but < 250 tpy
014808-60-7	QUARTZ	> 0 but < 10 tpy
000106-51-4	QUINONE	> 0 but < 10 tpy
008050-31-5	RESIN ACIDS & ROSIN ACID, ESTERS W/ GLYCEROL	> 0 but < 2.5 tpy
068152-50-1	ROSIN, POLYMER W/ DEG AND PENTAERYTHRITOL	> 0 but < 2.5 tpy
009000-59-3	SHELLAC	> 0 but < 2.5 tpy
006843-66-9	SILANE, DIMETHOXYDIPHENYL-	> 0 but < 2.5 tpy
000078-08-0	SILANE,ETHENYLTRIETHOXY-	> 0 but < 2.5 tpy
000078-10-4	SILICIC ACID, TETRAETHYL ESTER	> 0 but < 2.5 tpy
112945-52-5	SILICON DIOXIDE, AMORPHOUS	> 0 but < 10 tpy
067762-90-7	SILICONIZED SILICA	> 0 but < 2.5 tpy
007440-22-4	SILVER	> 0 but < 2.5 tpy
001310-73-2	SODIUM HYDROXIDE	> 0 but < 2.5 tpy
064742-89-8	SOLVENT NAPTHA, LIGHT ALIPHATIC	>= 100 tpy but < 250 tpy
008052-41-3	STODDARD SOLVENT	>= 50 tpy but < 100 tpy
000100-42-5	STYRENE	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 50 tpy but < 100 tpy
007446-11-9	SULFUR TRIOXIDE	> 0 but < 2.5 tpy
007664-93-9	SULFURIC ACID	> 0 but < 2.5 tpy
014807-96-6	TALC	> 0 but < 2.5 tpy
000085-43-8	TETRAHYDROPHTHALIC ANHYDRIDE	> 0 but < 2.5 tpy
007328-97-4	TETRAPHENYLOETHANE, EPICHLOROHYDRIN EPOXY RESIN	> 0 but < 2.5 tpy
013463-67-7	TITANIUM DIOXIDE	> 0 but < 2.5 tpy
000108-88-3	TOLUENE	>= 10 tpy
000126-73-8	TRIBUTYL PHOSPHATE	> 0 but < 2.5 tpy
000112-24-3	TRIETHYLENE TETRAMINE	> 0 but < 2.5 tpy
000552-30-7	TRIMELLITIC ANHYDRIDE	> 0 but < 2.5 tpy

000527-60-6	TRIMETHYL PHENOL, 2,4,6-	> 0 but < 2.5 tpy
000078-24-0	TRIPENTAERYTHRITOL	> 0 but < 2.5 tpy
008032-32-4	VM & P NAPHTHA	> 0 but < 2.5 tpy
0NY998-00-0	VOC	>= 250 tpy
013983-17-0	WOLLASTONITE	>= 2.5 tpy but < 10 tpy
001330-20-7	XYLENE, M, O & P MIXT.	>= 10 tpy
000106-42-3	XYLENE, PARA-	>= 10 tpy
007440-66-6	ZINC	> 0 but < 2.5 tpy
017501-44-9	ZIRCONIUM ACETONATE	> 0 but < 2.5 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6NYCRR Part 201-1.5

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

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

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.
(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

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

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

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

Item 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	102	Powers and Duties of the Department with respect to air pollution control
1-14NC2/-/NC2/01050	40CFR 60-A	75	General provisions
1-14NC2/-/NC2/01050	40CFR 60-VVV.742(a)	76	Standards of performance for polymeric coating of supporting substrates facilities - standards for VOC
1-14NC2/-/NC2/01050	40CFR 60-VVV.742(b)(2)	77	Standards of performance for polymeric coating of supporting substrates facilities - standards for VOC
1-14NC2/-/NC2/01050	40CFR 60-VVV.742(c)(1)	78	Standards of performance for polymeric coating of supporting substrates facilities -

			standards for VOC
1-14NC2/-/NC2/01050	40CFR 60-VVV.743(c)	79	Standards of performance for polymeric coating of supporting substrates facilities - compliance provisions
1-14NC2/-/NC2/01050	40CFR 60-VVV.744	80	Standards of performance for polymeric coating of supporting substrates facilities - monitoring requirements
1-14NC2/-/NC2/01050	40CFR 60-VVV.744(e)	81	Standards of performance for polymeric coating of supporting substrates facilities - monitoring requirements
1-14NC2/-/NC2/01050	40CFR 60-VVV.744(h)	82	Standards of performance for polymeric coating of supporting substrates facilities - monitoring requirements
1-14NC2/-/NC2/01050	40CFR 60-VVV.745(a)	83	Standards of performance for polymeric coating of supporting substrates facilities - test methods and procedures
1-14NC2/-/NC2/01050	40CFR 60-VVV.745(b)	84	Standards of performance for polymeric coating of supporting substrates facilities - test methods and procedures
1-14NC2/-/NC2/01050	40CFR 60-VVV.747	85	Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
1-14NC2/-/NC2/01050	40CFR 60-VVV.747(a)	86	Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
1-14NC2/-/NC2/01050	40CFR 60-VVV.747(d)(4)	87	Polymeric coating of supporting substrates - reporting and recordkeeping - monitoring incinerator combustion gas temperature
1-14NC2/-/NC2/01050	40CFR 60-VVV.747(d)(6)	88	Polymeric coating of supporting substrates

			- reporting and recordkeeping - monitoring vapor capture
FACILITY	40CFR 63-A.10(b)(2)	39	
FACILITY	40CFR 63-A.10(c)	40	
1-14NC1	40CFR 63-JJJJ.3320(b)(1	47	Paper and Other Web Coating NESHAP - Emission Standards - Organic HAP applied
1-14NC2	40CFR 63-JJJJ.3320(b)(1	68	Paper and Other Web Coating NESHAP - Emission Standards - Organic HAP applied
1-14NC1	40CFR 63-JJJJ.3350(c)(2	48	Paper and Other Web Coating NESHAP - Monitoring requirements for bypass lines - carseal/lock & key valve option
1-14NC2	40CFR 63-JJJJ.3350(c)(2	69	Paper and Other Web Coating NESHAP - Monitoring requirements for bypass lines - carseal/lock & key valve option
1-14NC1/-/NC1/00OX1	40CFR 63-JJJJ.3350(e)	54, 55, 56	Paper and Other Web Coating NESHAP - monitoring for a non-catalytic oxidizer
1-14NC2/-/NC2/00OX2	40CFR 63-JJJJ.3350(e)	89, 90, 91	Paper and Other Web Coating NESHAP - monitoring for a non-catalytic oxidizer
1-14NC1	40CFR 63-JJJJ.3350(f)	49	Paper and Other Web Coating NESHAP - Monitoring of capture systems
1-14NC2	40CFR 63-JJJJ.3350(f)	70	Paper and Other Web Coating NESHAP - Monitoring of capture systems
1-14NC1/-/CC2	40CFR 63-JJJJ.3360(c)	52	Paper and Other Web Coating NESHAP - Determination of organic HAP content
1-14NC1/-/NC1/00OX1	40CFR 63-JJJJ.3360(c)	57	Paper and Other Web Coating NESHAP - Determination of organic HAP content
1-14NC2/-/CC3	40CFR 63-JJJJ.3360(c)	73	Paper and Other Web Coating NESHAP - Determination of organic HAP content
1-14NC2/-/NC2/00OX2	40CFR 63-JJJJ.3360(c)	92	Paper and Other Web Coating NESHAP - Determination of organic HAP content
1-14NC1/-/NC1/00OX1	40CFR 63-JJJJ.3360(e)	58	Paper and Other Web Coating NESHAP - Performance tests to determine control

			device efficiency
1-14NC2/-/NC2/00OX2	40CFR 63-JJJJ.3360(e)	93	Paper and Other Web Coating NESHAP - Performance tests to determine control device efficiency
1-14NC1/-/NC1	40CFR 63-JJJJ.3360(f)	59	Paper and Other Web Coating NESHAP - Determination of capture efficiency
1-14NC2/-/NC2	40CFR 63-JJJJ.3360(f)	94	Paper and Other Web Coating NESHAP - Determination of capture efficiency
1-14NC1	40CFR 63-JJJJ.3370(k)	50	Paper and Other Web Coating NESHAP - compliance demonstration for oxidizers
1-14NC2	40CFR 63-JJJJ.3370(k)	71	Paper and Other Web Coating NESHAP - compliance demonstration for oxidizers
1-14NC1	40CFR 63-JJJJ.3370(n)	51	Paper and Other Web Coating NESHAP - determining compliance using combinations of capture and control
1-14NC2	40CFR 63-JJJJ.3370(n)	72	Paper and Other Web Coating NESHAP - determining compliance using combinations of capture and control
1-14NC1/-/NC1/00OX1	40CFR 63-JJJJ.3400(d)	60	Paper and Other Web Coating NESHAP - reporting - Notification of Performance Test reports
1-14NC2/-/NC2/00OX2	40CFR 63-JJJJ.3400(d)	95	Paper and Other Web Coating NESHAP - reporting - Notification of Performance Test reports
1-14NC1/-/NC1/00OX1	40CFR 63-JJJJ.3400(f)	61	Paper and Other Web Coating NESHAP - reporting - Performance test reports
1-14NC2/-/NC2/00OX2	40CFR 63-JJJJ.3400(f)	96	Paper and Other Web Coating NESHAP - reporting - Performance test reports
1-14NC1/-/NC1/00OX1	40CFR 63-JJJJ.3410	62	Paper and Other Web Coating NESHAP - Recordkeeping requirements
1-14NC2/-/NC2/00OX2	40CFR 63-JJJJ.3410	97	Paper and Other Web Coating NESHAP -

			Recordkeeping requirements
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	2	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	103	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 201-5.3(b)	104	Permit Content and Terms of Issuance - permit conditions
FACILITY	6NYCRR 201-6	22, 41, 42	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)	3	General conditions Fees
FACILITY	6NYCRR 201-6.5(a)(8)	15	General conditions
FACILITY	6NYCRR 201-6.5(c)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	5	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	6	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 202-1.1	18	Required emissions tests.
1-14NC1	6NYCRR 202-1.1	43	Required emissions tests.
1-14NC2	6NYCRR 202-1.1	63	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	105	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	19	General Prohibitions - visible emissions limited
1-33001	6NYCRR 212.10(c)(4)(iii	100	General Process Emission Sources - NOx and VOC RACT required at major facilities
1-14SL1/-/SLV	6NYCRR 212.3(a)	98	General Process Emission Sources - emissions from existing emission sources
1-33001	6NYCRR 212.3(a)	99	General Process Emission Sources - emissions from existing emission sources
1-42001	6NYCRR 212.3(a)	101	General Process Emission Sources - emissions from existing emission sources
FACILITY	6NYCRR 212.3(b)	25	General Process Emission Sources - emissions from existing emission sources
1-14NC2	6NYCRR 212.4(c)	64	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6(a)	26	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	1	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(a)(2)	27	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY	6NYCRR 225-1.8(a)	28	Reports, sampling and analysis.
FACILITY	6NYCRR 228.10	38	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 228.3(a)	29	Recordkeeping, reports for VOCs
1-14NC1	6NYCRR 228.3(c)	44	Solids as applied
1-14NC2	6NYCRR 228.3(c)	65	Solids as applied
FACILITY	6NYCRR 228.4	30	Opacity
FACILITY	6NYCRR 228.5(a)	31	VOC recordkeeping by the facility
FACILITY	6NYCRR 228.5(b)	32	Use of Methods 311 or 24.
FACILITY	6NYCRR 228.5(c)	33	Altnate sampling and analysis methods
FACILITY	6NYCRR 228.5(d)	34	Department Access to Obtain Samples

1-14NC1	6NYCRR 228.5(e)(2)	45	Demonstration of other than VOC solvent recovery
1-14NC2	6NYCRR 228.5(e)(2)	66	Demonstration of other than VOC solvent recovery
1-14NC1	6NYCRR 228.5(f)	46	Testing and monitoring; Methods 18, 25 and 25A
1-14NC2	6NYCRR 228.5(f)	67	Testing and monitoring; Methods 18, 25 and 25A
1-14NC1/-/NC1/00OX1	6NYCRR 228.5(g)(1)	53	Air cleaning device exhaust gas temperature monitoring
1-14NC2/-/NC2/00OX2	6NYCRR 228.5(g)(1)	74	Air cleaning device exhaust gas temperature monitoring
FACILITY	6NYCRR 228.6(a)	35	Prohibition of Sale
FACILITY	6NYCRR 228.7	36, 37	Table 1

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.

6NYCRR Part 200-.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 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

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

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

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

6NYCRR Part 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.

6NYCRR Part 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.

6NYCRR Part 201-5.3(b)
Lists those contaminants subject to contaminant specific requirements

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

6NYCRR 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.

6NYCRR 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.

6NYCRR 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.

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

6NYCRR Part 201-6.5(c)(2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according

to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)
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.

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

6NYCRR 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.

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

6NYCRR 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.

6NYCRR Part 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.

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

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

6NYCRR Part 211-.2
This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

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

40 CFR Part 68.
This Part lists the regulated substances and 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, VON ROLL USA INC has been determined to be subject to the following regulations:
40 CFR 60.742 (a)
Emission limitations as determined in approved performance tests shall be met at all times.

40 CFR 60.742 (b) (2)
Maintain records demonstrating that total enclosure is operating at 95% efficiency.

40 CFR 60.742 (c) (1)
Cover shall be maintained on mixing equipment at all times of operation. Covers shall be vented to controls meeting 95% destruction efficiency.

40 CFR 60.743 (c)
Covers on mixing equipment must be installed, maintained, and inspected according to this requirement.

40 CFR 60.744
Facility shall operate and maintain all control and monitoring equipment according to this regulation.

40 CFR 60.744 (e)
Install and operate monitoring equipment for the thermal oxidizer according to this regulation.

40 CFR 60.744 (h)
The facility shall install, maintain, operate, and calibrate total enclosure monitoring equipment as per manufacturers specification.

40 CFR 60.745 (a)
Method 24 should be used to determine VOC content of coatings.

40 CFR 60.745 (b)
Method 25 should be used to determine VOC concentration from incinerator gas streams.

40 CFR 60.747
Records of malfunctions must be submitted and kept for a period of at least two years.

40 CFR 60.747 (a)
Performance test data as per 60.8 must be submitted to the Department.

40 CFR 60.747 (d) (4)
Monitoring thermal incinerator combustion gas temperature for all 3-hour periods (during actual coating operations) during which the average combustion temperature of the device is > 28 C below the average combustion temperature of the device during the most recent stack test that showed compliance.

40 CFR 60.747 (d) (6)
Monitoring for total enclosure or vapor capture systems, all 3-hour periods (during actual coating operations) during which the average total enclosure or vapor capture system monitor readings vary by 5% or more from the average value measured during the most successful compliance test.

40 CFR 63.10 (b) (2)
This regulation contains the General record keeping requirements of 40 CFR 63 Subpart A. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

40 CFR 63.10 (c)
This regulation contains additional recordkeeping requirements for sources with continuous monitoring systems. The facility owner is responsible for reviewing these recordkeeping provisions in detail and complying with all applicable technical, administrative and reporting requirements.

40 CFR 63.3320 (b) (1)
This regulation requires that he affected source emit no more than 5% of the applied HAP for each month.

40 CFR 63.3350 (c) (2)
The facility must monitor and inspect each capture and control device to comply with subpart.

40 CFR 63.3350 (e)
Facility must install, operate, and maintain each CPMS specified in paragraphs (e)(9) and (10) and (f) of this section according to the requirements in paragraphs (e)(1) through (8) of this section.

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)
This condition requires the facility to calculate the portion of the coating that is organic hazardous air pollutants and spells out which methods are allowable to calculate the content. This condition will ensure that the facility is calculating their emissions of organic HAP in a consistent and easily

understandable manner when determining whether they are meeting the emission limits in this subpart.

40 CFR 63.3360 (e)
If the facility has ass 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 efficincy to ensure all HAP laden air is being treated by the control device.

40 CFR 63.3370 (k)

The faility must show compliance by following the procedures in paragraph (k)(1) of this section. Use the applicable equations specified in paragraph (k)(2) of this section to convert the monitoring and other data into units of the selected compliance option in paragraph (e) through (h) of this section. Compliance is determined in accordance with paragraph (k)(3) of this section.

40 CFR 63.3370 (n)
This regulation details the procedures that the facility must use to calculate organic HAP emissions during emissions testing.

40 CFR 63.3400 (d)
The facility must submit a notification of performance 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 (f)
The facility must submit a startup, shutdown, and malfunction procedure reports.

40 CFR 63.3410
The facility must keep records for at least five 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 Part 60, Subpart A
This regulation contains the General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements

6 NYCRR 212.10 (c) (4) (iii)
This rule allows those sources which cannot achieve an overall removal efficiency of 81% or use coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the department.

6 NYCRR 212.3 (a)
This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for existing (on or before July 1, 1973) process emission sources.

6 NYCRR 212.3 (b)
This rule requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

6 NYCRR 212.4 (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 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6 NYCRR 215.2

Except as allowed by section 215.3 of this Part, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

6 NYCRR 225-1.2 (a) (2)
This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6 NYCRR 225-1.8 (a)
Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6 NYCRR 228.10
This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6 NYCRR 228.3 (a)
This citation prohibits the use of coatings that exceed the maximum permitted pounds of volatile organic compounds per gallon, unless a coating system meeting certain requirements is used.

6 NYCRR 228.3 (c)
This citation specifies removal efficiency for an air cleaning device used as a control strategy. The air cleaning device must achieve an overall removal efficiency of the lower of 85% removal or the removal

determined using the equation specified in 6 NYCRR part 228.3(c).

6 NYCRR 228.4
This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6 NYCRR 228.5 (a)
This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228 , to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

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

6 NYCRR 228.5 (c)
This citation allows alternate sampling and analysis methods to be used, subject to the approval of the Department and the Administrator.

6 NYCRR 228.5 (d)
This citation allows representatives of the Department to obtain coating samples during reasonable business hours, for the purpose of determining compliance.

6 NYCRR 228.5 (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 228.5 (f)

The facility must follow protocol requirements and test procedures of Part 202. Test methods from Appendix A of 40 CFR part 60 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.

6 NYCRR 228.5 (g) (1)
This requires continuous monitors measure the exhaust gas temperature of all incinerators when an air

cleaning device is used.

6 NYCRR 228.6 (a)
This citation exempts specific coatings (or under specific conditions) from the prohibition of sale or specification.

6 NYCRR 228.7

Compliance Certification
Summary of monitoring activities at VON ROLL USA INC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
1-14NC2/-/NC2/01050	76	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	77	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	78	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	79	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	80	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	81	monitoring of process or control device parameters as surrogate
1-14NC2/-/NC2/01050	82	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	83	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	84	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	85	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	86	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	87	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	88	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
1-14NC1	47	record keeping/maintenance procedures
1-14NC2	68	record keeping/maintenance procedures
1-14NC1	48	monitoring of process or control device parameters as surrogate
1-14NC2	69	monitoring of process or control device parameters as surrogate
1-14NC1/-/NC1/00OX1	54	monitoring of process or

		control device parameters as surrogate
1-14NC1/-/NC1/00OX1	55	record keeping/maintenance procedures
1-14NC1/-/NC1/00OX1	56	monitoring of process or control device parameters as surrogate
1-14NC2/-/NC2/00OX2	89	monitoring of process or control device parameters as surrogate
1-14NC2/-/NC2/00OX2	90	record keeping/maintenance procedures
1-14NC2/-/NC2/00OX2	91	monitoring of process or control device parameters as surrogate
1-14NC1	49	record keeping/maintenance procedures
1-14NC2	70	record keeping/maintenance procedures
1-14NC1/-/CC2	52	record keeping/maintenance procedures
1-14NC1/-/NC1/00OX1	57	record keeping/maintenance procedures
1-14NC2/-/CC3	73	record keeping/maintenance procedures
1-14NC2/-/NC2/00OX2	92	record keeping/maintenance procedures
1-14NC1/-/NC1/00OX1	58	record keeping/maintenance procedures
1-14NC2/-/NC2/00OX2	93	record keeping/maintenance procedures
1-14NC1/-/NC1	59	record keeping/maintenance procedures
1-14NC2/-/NC2	94	record keeping/maintenance procedures
1-14NC1	50	record keeping/maintenance procedures
1-14NC2	71	record keeping/maintenance procedures
1-14NC1	51	record keeping/maintenance procedures
1-14NC2	72	record keeping/maintenance procedures
1-14NC1/-/NC1/00OX1	60	record keeping/maintenance procedures
1-14NC2/-/NC2/00OX2	95	record keeping/maintenance procedures
1-14NC1/-/NC1/00OX1	61	record keeping/maintenance procedures
1-14NC2/-/NC2/00OX2	96	record keeping/maintenance procedures
1-14NC1/-/NC1/00OX1	62	record keeping/maintenance procedures
1-14NC2/-/NC2/00OX2	97	record keeping/maintenance procedures
FACILITY	104	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
1-14NC1	43	intermittent emission

		testing
1-14NC2	63	intermittent emission testing
FACILITY	7	record keeping/maintenance procedures
1-33001	100	record keeping/maintenance procedures
FACILITY	25	intermittent emission testing
1-14NC2	64	monitoring of process or control device parameters as surrogate
FACILITY	26	record keeping/maintenance procedures
FACILITY	27	work practice involving specific operations
FACILITY	28	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures
1-14NC1	46	record keeping/maintenance procedures
1-14NC2	67	record keeping/maintenance procedures
1-14NC1/-/NC1/00OX1	53	monitoring of process or control device parameters as surrogate
1-14NC2/-/NC2/00OX2	74	monitoring of process or control device parameters as surrogate
FACILITY	36	work practice involving specific operations
FACILITY	37	work practice involving specific operations

Basis for Monitoring

6 NYCRR 201-5.3(b)
This condition gives the DEC regional address where reports are to be submitted.

6 NYCRR 201-6.5(c)(3)
This condition explains when and to whom reports must be submitted.

6 NYCRR 201-6.5(d)(5)
This condition explains what is needed with progress reports.

6 NYCRR 201-6.5(e)
This condition explains what is necessary to include with compliance reports.

6 NYCRR 202-2.1
This condition details when emission statements should be sent.

6 NYCRR 212.3(b)
This condition requires and allows the Department to require a stack test for particulate standards.

6 NYCRR 212.4(c)
This condition allows Department to conduct Method 9 observations, and requires facility to complete Method 9 observations.

6 NYCRR 212.6(a)
This condition requires facility to report data when opacity limits are exceeded.

6 NYCRR 212.10(c)(4)(iii)
This condition requires facility to monitor and maintain monthly records of VOC emissions.

6 NYCRR 225-1.2(a)(2)
This condition limits amount of sulfur allowed in fuel.

6 NYCRR 225-1.8(a)
This condition requires facility to maintain fuel oil certifications.

6 NYCRR 228.3(b)
This condition allows facility to shut down oxidizer during summer months with approval of Department.

6 NYCRR 228.4
This condition limits visible opacity to 20%.

6 NYCRR 228.5(a)
This condition requires the facility to provide VOC calculations for each coating as applied upon request.

6 NYCRR 228.5(f)
This condition requires facility to use specific testing methods.

6 NYCRR 228.5(g)(1)
This condition requires that a cleaning device must be used while coating devices are in operation.

6 NYCRR 228.10
Facility should handle, store, and dispose of VOC's according to this condition.

40 CFR 60 VVV 742(a)
Facility shall comply with emission limits set in most recently approved stack test.

40 CFR 60 VVV 742(b)(2)
Facility shall install, maintain and operate permanent total enclosure around coating device.

40 CFR 60 VVV 742(c)(1)
Facility shall maintain cover on all coating equipment and materials.

40 CFR 60 VVV 743(c)
Facility shall demonstrate compliance with covers by methods listed in this condition.

40 CFR 60 VVV 744(e)
This condition limits accuracy of temperature monitoring equipment.

40 CFR 60 VVV 744(h)
This condition lists the criteria required to demonstrate compliance for total enclosure.

40 CFR 60 VVV 745(a)
This condition details method used to determine VOC content.

40 CFR 60 VVV 747
This condition details the recordkeeping requirements of VVV 747.

40 CFR 60 VVV 747(d)(4)
This condition explains monitoring, record keeping, and reporting requirements for thermal oxidizers.

40 CFR 60 VVV 747(d)(6)
This condition specifies monitoring requirements for the permanent enclosures.

40 CFR 63 JJJJ 3320(b)(1)
This condition specifies what emission standards must be met.

40 CFR 63 JJJJ 3350(c)(2)
The facility must monitor and inspect each capture and control device according to this regulation.

40 CFR 63 JJJJ 3350(e)
This condition specifies accuracy of monitoring equipment.

40 CFR 63 JJJJ 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 JJJJ 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 JJJJ 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 limitation in this subpart.

40 CFR 63 JJJJ 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 JJJJ 3370(k)
This condition specifies the procedures to be used for determining compliance with regulation.

40 CFR 63 JJJJ 3400(d)
The facility must submit a notification of performance test and a site specific test plan must be submitted to ensure the efficiency of the capture system and control devices.

40 CFR 63 JJJJ 3400(f)
The facility must submit performance test reports.

40 CFR 63 JJJJ 3410
The facility must keep records for at least 5 years. Two of the years must be readily available and the remaining years can be stored off site or on a computer. This rule also indicates what specific information must be kept for the five years.