New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-4228-00076/00117
Renewal Number: 2
11/04/2015

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

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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
This permit action is the renewal of Von Roll's Title V Permit and integration of NESHAP standards for the following:
- 40 CFR Part 63, Subpart FFFF, Miscellaneous Organic Chemical Manufacturing (MON)
- 40 CFR Part 63, Subpart OOOO, Printing, Coating, and Dyeing of Fabrics and Other Textiles (Fabric

Coating)
- 40 CFR Part 63, Subpart HHHHH, Miscellaneous Coating Manufacturing (MCM)
- 40 CFR Part 63, Subpart DDDDD, Industrial, Commercial, and Institutional Boilers and Process Heaters.

The MON regulates equipment necessary to operate a miscellaneous organic chemical manufacturing process (MCPU), e.g., reactors, etc.; associated storage tanks and transfer racks; equipment used to convey or store wastewater; and equipment components such as pumps, compressors, agitators, pressure relief devices, sampling connection systems, ope-ended valves or lines, valves, connectors, and instrumentation systems. Building RV33 equipment in which chemical reactions take place is subject to the MON.

The MCM NESHAP regulates equipment used to manufacture coatings, including process vessels; storage tanks; pumps, compressors, agitators, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, and instrumentation systems; and wastewater tanks. It does not include reactors. The MCM NESHAP applies to the manufacturing of a coating, where the manufacturing steps involve blending, mixing, diluting, and related formulation operations, without an intended reaction. Operations that are defined as affiliated operations are exempt from the MON and MCM NESHAP. Affiliated
operations include the mixing and blending of coatings for on-site operations subject to 40 CFR Part 63, Subpart JJJJ or 40 CFR Part 63, Subpart OOOO.

Von Roll operates surface coaters that have been identified as being subject to 40 CFR Part 63, Subpart JJJJ,
National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (POWC). The surface
coaters typically coat both fabric and paper substrates. In accordance with Section 63.4281(e) of Subpart OOOO, any web coating line that coats both fabric and other textiles, and another substrate such as paper, must comply with the subpart that applies to the predominant activity conducted on the affected source. Predominant activity is defined as 90 % of the mass of substrate coated during the compliance period. Therefore, unless a surface coater is used to coat at least 90% paper and less than 10% fabric and other textiles, it is subject to the Fabric Coating standards.

Only the Kiss coaters coat 90% or more paper substrate. Therefore, the other surface coaters (i.e., Hot Melt, Roll coater, Laminator, 1040 coater, 1050 coater, and the Towers), which each coat less than 90% paper substrate, are subject to the Fabric Coating NESHAP.

Von Roll operates four natural gas-fired boilers and two natural gas-fired process heaters that are subject to the Major Source Boiler MACT.

In addition, Von Roll is seeking to incorporate two State Facility Permits (SFPs) that have been issued during the past year: Application ID 4-4228-00076-00119 for four new vertical storage tanks with design capacities less than 10,000 gallons, and Application ID 4-4228-00076-00120 for a new surface coater (Kiss II) that applies compliant coatings to primarily paper substrates.
To accommodate the new applicable requirements and incorporate the two SFPs, the following changes in the permit structure have been made:
- A new process (CC4) in emission unit 1-14CC1 has been established for the Kiss II Coater, which applies compliant coatings and is subject to 40 CFR Part 63, Subpart JJJJ, and 40 CFR Part 60, Subpart VV, Polymeric Coating of Supporting Substrates.
- The 1531 Hot Melt Treater (01531), which is subject to Subpart OOOO, has been moved from process CC1 to process CC5. Process CC1 includes the Kiss Coater, which is subject to Subpart JJJJ.
- New processes are established in emission unit 1-33001 for the MCPUs, each including the equipment

necessary to produce a Family of Materials (FOM) subject to Subpart FFFF.
- A new process (MCM) is established in emission unit 1-33001 for equipment operations subject to Subpart HHHHH.
- A new process (AFL) is established in emission unit 1-33001 for equipment operations that are considered affiliated operations subject to either Subpart JJJJ or Subpart OOOO.
- A new process (TRN) is established in emission unit 1-33001 for a transfer rack that is subject to Subpart FFFF.
- A new emission unit (1-TANKS) is established for the existing storage tank 000M9 (renamed TNK09), which is being moved from emission unit 1-33001, and the four vertical storage tanks authorized under Application ID 4-4228-00076-00119.

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 2TANKS -

Emission unit 2TANKS is associated with the following emission points (EP):
12165, 12166, 12167, 12168, 12169, 12170, 12171, 12172
Process: TK3 is located at Building TANKFARM -
Process: TK4 is located at Building TANKFARM -

Emission unit 114NC1 - RV14 Primary Non-compliant Coating Lines: includes all the emissions from four surface coating lines (Laminator, 1040 Treater, Vertical Towers 1 & 2). 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 for fabric, </=0.08 lb VOC/lb coating for paper/film, and non-HAP) at which time the process does not require control equipment. However, control is required when using VOC- or HAP containing thinners or cleanup solvents, in accordance with 40 CFR Part 63, Subpart OOOO.

Emission unit 114NC1 is associated with the following emission points (EP):
12006, 12007, 12008, 12012, 12013, 12016, 12017, 12039, 12040, 12041, 12042, 12044
Process: CC2 is located at FIRST FLOOR, Building RV14 - Subpart 228-1 compliant coatings (low volatile coatings, </=2.9 lb VOC/gal for fabric and </= 0.08 lb VOC/lb coating for paper/film and non-HAP) on the treaters in EU 1-14NC1, which are subject to the Fabric Coating NESHAP (40 CFR Part 63, Subpart OOOO). Process includes all VOC and HAP in the coating systems and any solvents used. Includes 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. for fabric and > 0.08 lb VOC/lb coating for paper/film and HAP volatiles) and subject to Fabric Coating NESHAP (40 CFR Part 63, Subpart OOOO). Process includes all VOCs in the coating systems and in any

solvents used. Also see FB1 for fuel burning from this source.

Emission unit 114CC1 - RV14 Compliant Coating Lines: Includes emissions from three coating lines, the Kiss Coater (0KISS), Kiss II Coater (KISS2), and 1531 Hot Melt Treater (01531), which treat substrates using low volatile coatings. EP 12009 serves the Kiss Coater. Emissions from the Kiss Coater also vent to EP 12023, which also receives emissions from the Kiss II Coater and the 1531 Hot Melt Treater. This emission unit also includes the small (SOVEN, EP12021) and large (LOVEN, EP 12022) ovens, which are used to cure the substrates treated by the Kiss Coater, Kiss II Coater, and 1531 Hot Melt Treater.

Compliant coatings are those that contain </= 0.08 lb VOC/lb coating for paper coating and </= 2.9 lb VOC/gallon of coating for fabric coating in compliance with Subpart 228-1, and </= 0.04 lb organic HAP/lb coating materials applied each month or </= 0.20 lb organic HAP/lb coating solids applied each month in compliance with 40 CFR Part 63, Subpart JJJJ (Paper and Other Web Coating NESHAP), or </= 0.12 lb organic HAP/lb of solids applied for each coating material and use of only thinning and cleaning materials that contain no organic HAP (i.e., no organic HAP is present at 0.1% by mass or more for OSHA-defined carcinogens as specifified in 20 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds) in compliance with 40 CFR Part 63, Subpart OOOO (Fabric Coating NESHAP).

Kiss and Kiss II coat primarily paper substrates, and the 1531 Hot Melt coats primarily fabric substrates.

The Kiss and Kiss II Coaters are subject to 40 CFR Part 63, Subpart JJJJ - Paper and Other Web Coating (POWC) NESHAP. The 1531 Hot Melt coater is subject to 40 CFR Part 63, Subpart OOOO - Fabric Coating NESHAP. All three coating lines are subject to 6 NYCRR Subpart 228-1 - Surface Coating Processes.

In addition, Kiss II coater (KISS2) is subject to 40 CFR Part 60, Subpart VVV - Polymeric Coating of supporting substrates.

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 </= 0.08 lb VOC/gal and non-HAP) used at the Kiss Coater, which is subject to the Papaer and Other Web Coating NESHAP (40 CFR Part 63, Subaprt JJJJ). Includes the Small and Large Batch Ovens. Also see FB-2 for fuel burning associated with the ovens.

Process: CC4 is located at First Floor, Building RV14 - Compliant coatings (low volatile coatings </= 0.08 lb VOC/lb coating and non-HAP) used at the Kiss II Coater, which is subject to the POWC NESHAP (40 CFR Part 63, Subpart JJJJ). Includes the Small and Large Batch Ovens. Also see FB2 for fuel burning associated with these sources.

Process: CC5 is located at First Floor, Building RV14 - Compliant coatings (low volatile coatings </= 2.9 lb VOC/galon coating and non-HAP) used at the 1531 Hot Melt Treater, which is subject to the Fabric Coating NESHAP (40 CFR Part 63, Subpart OOOO). Includes the Small and Large Batch Ovens. Also see FB2 for fuel burning associated with these sources.

Process: FB2 is located at FIRST FLOOR, Building RV14 - Natural Gas Burning associated with EU 1-14CC1 (Small and Large Batch Ovens).

Emission unit 114NC2 - RV14 Secondary Non-compliant Coating Lines: includes all the emissions from three surface coating lines (1196 Treater with the Reverse Roll Coater and 1050 Treater). Unit includes the sodium hydroxide from the 1196 Treater belt drier, 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 for fabric and </=0.08 lb VOC/lb coating for paper/film 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. However, control is required when using VOC or HAP containing thinners or cleanup solvents, in accordance with 40 CFR Part 63, Subpart OOOO.

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 A Treater Belt Drier is part of the process where sodium hydroxide solution is sprayed on the belt and hot air is used to dry the belt prior to its entry 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 for fabric and </=0.08 lb VOC/lb coating for paper film consistent with NYCRR Part 228, non HAP, 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 for fabric and >0.08 lb VOC/lb coating for paper/film and HAP volatiles). Process includes all VOCs and HAPs 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.

This emission unit is comprised of equipment subject to:
- 40 CFR Part 63, Subpart FFFF, Miscellaneous Organic Chemical Manufacturing (MON)
- 40 CFR Part 63, Subpart HHHHH, Miscellaneous Coating Manufacturing (MCM).
- 40 CFR Part 63, Subpart JJJJ, Paper and Other Web Coating (POWC)
- 40 CFR Part 63, Subpart OOOO, Printing, Coating, and Dyeing of Fabrics and Other Textiles (Fabric Coating).

The MON processes, which involve equipment used to make products where a chemical reaction takes place, are 707, 712, 724, ACR, AIR, 0CC, FAB, DAI, MIC, PEI, SIL, SOL, STY, TBS, and WAT. The MCM process (MCM) consists of equipment used to make blended coatings that are sent off site. When making blended coatings that are used on site in Building RV14 surface coating operations, the associated equipment is considered affiliated operations subject to either Subpart JJJJ or OOOO. These affiliated operations comprise process AFL. A transfer rack (00TWL), which is subject to the MON, is in process TRN.

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, 12148, 12149, 12150, 12151, 12152, 12153, 12155, 12156, 12157, 12158
Process: 0CC is located at Building RV33 - CC-3315 family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: 707 is located at Building RV33 - 707 family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: 712 is located at Building RV33 - 712 family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: 724 is located at Building RV33 - 724 family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: ACR is located at Building RV33 - AcryMethacry family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: AFL is located at Building RV33 - Preparation of coatings applied on site as part of affiliated operations subject to paper and Other Web Coating NESHAP (40 CFR Part 63, Subpart JJJJ) or Fabric Coating NESHAP (40 CFR Part 63, Subpart OOOO). This process is not subject to either the MON or MCM regulations.

Process: AIR is located at Building RV33 - Air Dry family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: DA1 is located at Building RV33 - DAIP family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: FAB is located at Building RV33 - Coated Fabrics family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: MCM is located at Building RV33 - Preparation of coatings subject to the Miscellaneous Coating Manufacturing (MCM) regulation (40 CFR Part 63, Subpart HHHHH).

Process: MIC is located at Building RV33 - Flake/mica family of materials (FOM) consisting of Group 2
Process: PEI is located at Building RV33 - PEI family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: SIL is located at Building RV33 - Silicone family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: SOL is located at Building RV33 - Solvent Bake family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: STY is located at Building RV33 - Styrene family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: TBS is located at Building RV33 - TBS family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: TRN is located at Building RV33 - Group 2 transfer rack used to load MON- and/or MCM-regulated products to tanks trucks.

Process: WAT is located at Building RV33 - Water Borne family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Emission unit 142001 - RV42 Hazardous Waste Drum Compactor: Includes the emissions from the ventilation of 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.

Emission unit 1TANKS - This emission unit includes one 10,000-gallon horizontal solvent storage tank (TNK09, renamed from 000M9) and four vertical solvent storage tanks (TNK10, TNK11, TNK12, TNK13). Due to the tanks' predominant use, they are regulated under the MCM NESHAP and meet the definition of Group 2 storage tank. TNK09, TNK10, TNK11, TNK12 operate with a nitrogen blanket. All five tanks are equipped with conservation vents.

Emission unit 1TANKS is associated with the following emission points (EP):
12146, 12147, 12161, 12162, 12163, 12164
Process: TK1 is located at Building TANKFARM -

Title V/Major Source Status
VON ROLL USA INC is subject to Title V requirements. This determination is based on the following information:
Von Roll is major for VOC and HAP

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	NO
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - 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 231-5, 231-6) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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
2821	PLASTICS MATERIALS AND RESINS
2851	PAINTS AND ALLIED PRODUCTS
3299	NONMETALLIC MINERAL PRODUCTS
2295	COATED FABRICS, NOT RUBBERIZED

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
4-07-999-97	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - MISCELLANEOUS Specify in Comments

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)-		> 0 but < 2.5 tpy

	TRIONE,1,3,5-TRIS(2-HYDROXY)	
001087-21-4	1,3-BENZENECARBOXILIC ACID, DI-2-PROPENYL ESTER	> 0 but < 2.5 tpy
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'-DIAMINODIPHENYLMETH	> 0 but < 10 tpy

	ANE	
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
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	> 0 but < 2.5 tpy

	FORMALDEHYDE, GLYCIDYL ETHER	
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
0NY100-00-0	TOTAL HAP	>= 250 tpy but < 75,000 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 but < 75,000 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 - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;
(3) During the period of the emergency the facility owner 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 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 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 201-6.2(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 201-6.2(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 201-6.4(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 201-6.4(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 201-6.4(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 201-6.4(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.4(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 201-6.4(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 201-6.4(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	185	Powers and Duties of the Department with respect to air pollution control
1-14CC1/-/CC4/KISS2	40CFR 60-VVV.740(b)	103	Standards of performance for

			polymeric coating of supporting substrates facilities
1-14NC2/-/NC2/01050	40CFR 60-VVV.740(b)	145	Standards of performance for polymeric coating of supporting substrates facilities
1-14CC1/-/CC4/KISS2	40CFR 60-VVV.744(b)	104	Standards of performance for polymeric coating of supporting substrates facilities - monitoring requirements
1-14NC2/-/NC2/01050	40CFR 60-VVV.744(b)	146	Standards of performance for polymeric coating of supporting substrates facilities - monitoring requirements
1-14CC1/-/CC4/KISS2	40CFR 60-VVV.747(b)	105	Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
1-14NC2/-/NC2/01050	40CFR 60-VVV.747(b)	147	Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
1-14CC1/-/CC4/KISS2	40CFR 60-VVV.747(c)	106	Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
1-14NC2/-/NC2/01050	40CFR 60-VVV.747(c)	148	Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
FACILITY	40CFR 63-A.10(b)(2)	37	
FACILITY	40CFR 63-A.10(c)	38	
FACILITY	40CFR 63-DDDDD	62	Boilers and Process Heaters Major Source NESHAP rule
1-33001	40CFR 63-F.105	149	Subpart F - HON NESHAP - maintenance wastewater requirements
FACILITY	40CFR 63-FFFF.2445(b)	63	Miscellaneous Organic Chemical Mfg NESHAP - Compliance Date for existing source
FACILITY	40CFR 63-FFFF.2460(b)	64	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status

FACILITY	40CFR 63-FFFF.2460(c)	65, 66	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Exceptions to Subpart SS
FACILITY	40CFR 63-FFFF.2465(b)	67	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - uncontrolled hydrogen halide & halogen HAP emissions.
FACILITY	40CFR 63-FFFF.2480	68	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
FACILITY	40CFR 63-FFFF.2485	69, 70	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
FACILITY	40CFR 63-FFFF.2520	71, 72	Miscellaneous Organic Chemical Mfg NESHAP - Reporting
FACILITY	40CFR 63-FFFF.2525	73	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
FACILITY	40CFR 63-FFFF.2535(l)	74	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Applicability of process units included in a process unit group
FACILITY	40CFR 63-G.132(f)	39	HON - process wastewater provisions - general
FACILITY	40CFR 63-G.132(g)	40	HON - process wastewater provisions - general
FACILITY	40CFR 63-G.133(a)(1)	41	HON - process wastewater provisions - wastewater tanks
FACILITY	40CFR 63-G.133(b)(1)	42	HON - process wastewater provisions - wastewater tanks
FACILITY	40CFR 63-G.133(f)	43	HON - process wastewater provisions - wastewater tanks
FACILITY	40CFR 63-G.135(b)	44	HON - process wastewater provisions - containers
FACILITY	40CFR 63-G.135(c)	45	HON - process wastewater provisions - containers
FACILITY	40CFR 63-G.135(e)	46	HON - process wastewater provisions - containers

FACILITY	40CFR 63-G.135(f)	47	HON - process wastewater provisions - containers
FACILITY	40CFR 63-G.140	48	HON - process wastewater provisions - inspection and monitoring of operations
FACILITY	40CFR 63-G.143(a)	49	HON - process wastewater provisions - inspections and monitoring of operations
FACILITY	40CFR 63-G.146(c)	50	HON - process wastewater provisions - reporting
FACILITY	40CFR 63-G.147(b)	51	HON - process wastewater provisions - recordkeeping
FACILITY	40CFR 63-G.147(f)	52	HON - process wastewater provisions - recordkeeping
FACILITY	40CFR 63-G.148(d)	53	Leak inspection provisions
FACILITY	40CFR 63-G.148(e)	54	Leak inspection provisions
FACILITY	40CFR 63-G.148(g)	55	Leak inspection provisions
FACILITY	40CFR 63-G.148(h)	56	Leak inspection provisions
FACILITY	40CFR 63-G.148(i)	57	Leak inspection provisions
1-33001/-/MCM	40CFR 63-HHHHH.8000(a)	165	Miscellaneous Coating Mfg. NESHAP - General Requirements
1-33001/-/MCM	40CFR 63-HHHHH.8000(b)	166	Miscellaneous Organic Coating Mfg. NESHAP - General Requirements
1-33001/-/MCM	40CFR 63-HHHHH.8000(d)	167, 168	Miscellaneous Organic Coating Mfg. NESHAP - Exceptions
1-33001/-/MCM	40CFR 63-HHHHH.8005(a)	169, 170, 171, 172, 173, 174	Miscellaneous Organic Coating Mfg. NESHAP - Emission Limits
1-33001/-/MCM	40CFR 63-HHHHH.8005(d)	175	Miscellaneous Organic Coating Mfg. NESHAP - Initial Compliance Demonstration
1-33001/-/MCM	40CFR 63-HHHHH.8005(e)	176	Miscellaneous Organic Coating Mfg - Establishing operating limits
1-33001/-/MCM	40CFR 63-HHHHH.8005(g)	177	Miscellaneous Coating Mfg. NESHAP - Flow Indicators
1-33001/-/MCM	40CFR 63-HHHHH.8015	178	Miscellaneous Coating Mfg. NESHAP - Equipment Leaks
1-33001/-/MCM	40CFR 63-HHHHH.8050(d)	179	Misc. Organic Coating Mfg. NESHAP - Process vessel emissions averaging continuous compliance
1-33001/-/MCM	40CFR 63-HHHHH.8055	180	Misc. Organic Coating

			Mfg. NESHAP - Coating products weight percent HAP limit option
1-33001/-/MCM	40CFR 63-HHHHH.8075(e)	181	Miscellaneous Coating Mfg. NESHAP - Compliance reports
1-33001/-/MCM	40CFR 63-HHHHH.8080	182	Misc. Organic Coating Mfg. NESHAP - recordkeeping
1-14CC1/-/CC1	40CFR 63-JJJJ.3320(b)(2	92	Paper and Other Web Coating NESHAP - emission standard based on mass of coating materials
1-14CC1/-/CC4	40CFR 63-JJJJ.3320(b)(2	97	Paper and Other Web Coating NESHAP - emission standard based on mass of coating materials
1-14CC1/-/CC1	40CFR 63-JJJJ.3320(b)(3	93	Paper and Other Web Coating NESHAP - Emission standard - mass of coating solids option
1-14CC1/-/CC4	40CFR 63-JJJJ.3320(b)(3	98	Paper and Other Web Coating NESHAP - Emission standard - mass of coating solids option
FACILITY	40CFR 63-JJJJ.3350(f)	75	Paper and Other Web Coating NESHAP - Monitoring of capture systems
FACILITY	40CFR 63-JJJJ.3360(c)	76, 77	Paper and Other Web Coating NESHAP - Determination of organic HAP content
1-14CC1/-/CC1	40CFR 63-JJJJ.3360(c)	94	Paper and Other Web Coating NESHAP - Determination of organic HAP content
1-14CC1/-/CC4	40CFR 63-JJJJ.3360(c)	99	Paper and Other Web Coating NESHAP - Determination of organic HAP content
FACILITY	40CFR 63-JJJJ.3370(b)	78	Paper and Other Web Coating NESHAP - Requirements for showing compliance
1-14CC1/-/CC1	40CFR 63-JJJJ.3370(b)	95	Paper and Other Web Coating NESHAP - Requirements for showing compliance
1-14CC1/-/CC4	40CFR 63-JJJJ.3370(b)	100, 101	Paper and Other Web Coating NESHAP - Requirements for showing compliance
1-14CC1/-/CC1	40CFR 63-JJJJ.3370(c)	96	Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials

1-14CC1/-/CC4	40CFR 63-JJJJ.3370(c)	102	Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials
FACILITY	40CFR 63-JJJJ.3370(e)	79	Paper and Other Web Coating NESHAP - Compliance Demonstration - 95/98% control option
FACILITY	40CFR 63-JJJJ.3400(c)	80	Paper and Other Web Coating NESHAP - reporting - semiannual compliance report
FACILITY	40CFR 63-JJJJ.3400(g)	81	Paper and Other Web Coating NESHAP - reporting - startup/shutdown/malfunction reports
FACILITY	40CFR 63-JJJJ.3410	82	Paper and Other Web Coating NESHAP - Recordkeeping requirements
1-14CC1/-/CC5	40CFR 63-OOOO.4291(a)	107	Fabric Printing, Coating, Dyeing NESHAP - Compliance options for web coating and printing
1-14NC1/-/CC2	40CFR 63-OOOO.4291(a)	111	Fabric Printing, Coating, Dyeing NESHAP - Compliance options for web coating and printing
1-14NC1/-/NC1	40CFR 63-OOOO.4291(a)	115	Fabric Printing, Coating, Dyeing NESHAP - Compliance options for web coating and printing
1-14NC2/-/CC3	40CFR 63-OOOO.4291(a)	127	Fabric Printing, Coating, Dyeing NESHAP - Compliance options for web coating and printing
1-14NC2/-/NC2	40CFR 63-OOOO.4291(a)	132, 133	Fabric Printing, Coating, Dyeing NESHAP - Compliance options for web coating and printing
1-14NC1/-/NC1	40CFR 63-OOOO.4292(b)	116	Fabric Coating/Printing/Dyeing NESHAP - Operating Limits
1-14NC1/-/NC1	40CFR 63-OOOO.4293(b)	117	Fabric Coating/Printing/Dyeing NESHAP - Work Practice Standards
1-14NC1/-/NC1	40CFR 63-OOOO.4300(a)	118	NESHAP for Coating, Printing, Dyeing of Fabrics and Other Textiles - Emission Limits
1-14NC2/-/NC2	40CFR 63-OOOO.4300(a)	134	NESHAP for Coating,

			Printing, Dyeing of Fabrics and Other Textiles - Emission Limits
FACILITY	40CFR 63-OOOO.4300(b)	83	NESHAP for Coating, Printing, Dyeing of Fabrics and Other Textiles - General Requirements
1-14NC1/-/NC1	40CFR 63-OOOO.4300(c)	119	NESHAP for Coating, Printing, and Dyeing of Fabrics and Other Textiles - General Requirements
1-14NC2/-/NC2	40CFR 63-OOOO.4300(c)	135	NESHAP for Coating, Printing, and Dyeing of Fabrics and Other Textiles - General Requirements
FACILITY	40CFR 63-OOOO.4311(a)	84	Fabric Coating/Printing/Dyeing NESHAP - Reporting
1-14NC2/-/NC2	40CFR 63-OOOO.4311(b)	136	Fabric Coating/Printing/Dyeing NESHAP - Reporting
1-14NC2/-/NC2	40CFR 63-OOOO.4311(c)	137	Fabric Coating/Printing/Dyeing NESHAP - Reporting
FACILITY	40CFR 63-OOOO.4312	85	Fabric Coating/Printing/Dyeing NESHAP - Recordkeeping
FACILITY	40CFR 63-OOOO.4313	86	Fabric Coating/Printing/Dyeing NESHAP - Record retention
1-14NC2/-/NC2	40CFR 63-OOOO.4313	138	Fabric Coating/Printing/Dyeing NESHAP - Record retention
1-14NC1/-/NC1	40CFR 63-OOOO.4351(d)	120	Fabric Coating/Printing/Dyeing NESHAP - Overall Control Efficiency and Oxidizer Outlet Concentration - Initial Compliance
1-14NC2/-/NC2	40CFR 63-OOOO.4351(d)	139	Fabric Coating/Printing/Dyeing NESHAP - Overall Control Efficiency and Oxidizer Outlet Concentration - Initial Compliance
1-14NC1/-/NC1	40CFR 63-OOOO.4352	121	Fabric Coating/Printing/Dyeing NESHAP - Overall Control Efficiency and Oxidizer Outlet Concentration Option- Cont. Compliance
1-14NC2/-/NC2	40CFR 63-OOOO.4352	140	Fabric Coating/Printing/Dyeing NESHAP - Overall

			Control Efficiency and Oxidizer Outlet Concentration Option-Cont. Compliance
1-14NC1/-/NC1	40CFR 63-OOOO.4364(a)	122	Fabric Coating/Printing/Dyeing NESHAP - Continuous Parametric Monitoring System Requirements
1-14NC2/-/NC2	40CFR 63-OOOO.4364(a)	141	Fabric Coating/Printing/Dyeing NESHAP - Continuous Parametric Monitoring System Requirements
1-14NC1/-/NC1	40CFR 63-OOOO.4364(b)	123	Fabric Coating/Printing/Dyeing NESHAP - Capture System Bypass Line requirements
1-14NC2/-/NC2	40CFR 63-OOOO.4364(b)	142	Fabric Coating/Printing/Dyeing NESHAP - Capture System Bypass Line requirements
1-14NC1/-/NC1	40CFR 63-OOOO.4364(c)	124	Fabric Coating/Printing/Dyeing NESHAP - Oxidizer requirements
1-14NC2/-/NC2/00OX2	40CFR 63-OOOO.4364(c)	144	Fabric Coating/Printing/Dyeing NESHAP - Oxidizer requirements
1-14NC1/-/NC1	40CFR 63-OOOO.4364(e)	125	Fabric Coating/Printing/Dyeing NESHAP - Capture system monitoring
1-14NC2/-/NC2	40CFR 63-OOOO.4364(e)	143	Fabric Coating/Printing/Dyeing NESHAP - Capture system monitoring
1-33001/-/MCM	40CFR 63-R.424	150	Subpart R standard: Equipment leaks
1-33001/-/MCM	40CFR 63-R.428	151	Subpart R standard: Reporting and recordkeeping
1-33001/-/MCM	40CFR 63-SS.982(c)(2)	152	National Emission Standards for Closed Vent Systems - Closed vent systems with nonflare control devices
1-33001/-/MCM	40CFR 63-SS.990(a)	153	NESHAP For Closed Vent Systems, Control Devices, etc. - Absorbers & Condensers as Control Devices - equipment and operation
1-33001/-/MCM	40CFR 63-SS.990(c)(1)	154	NESHAP for Closed Vent Systems, Control Devices, etc. - Monitoring

			Requirements for Absorbers
1-33001/-/MCM	40CFR 63-SS.990(c)(2)	155	NESHAP for Closed Vent Systems, Control Devices, etc. - Absorbers, Condensors as Control
1-33001/-/MCM	40CFR 63-SS.996(c)	156	NESHAP for Closed Vent Systems, Control Devices, etc. - Continuous Monitoring Parameter Systems
1-33001/-/MCM	40CFR 63-SS.996(d)	157	NESHAP for Closed Vent Systems & Control Devices - Alternatives to Monitoring Requirements
1-33001/-/MCM	40CFR 63-SS.998(a)(2)	158	Recordkeeping Requirements
1-33001/-/MCM	40CFR 63-SS.998(b)	159	Recordkeeping Requirements
1-33001/-/MCM	40CFR 63-SS.998(c)(1)	160	NESHAP for Closed Vent Systems & Control Devices - Recordkeeping Provisions - nonflare control & recovery device - monitoring
1-33001/-/MCM	40CFR 63-SS.998(c)(3)	161	NESHAP for Closed Vent Systems & Control Devices - Recordkeeping Provisions - nonflare control device - other control devices
1-33001/-/MCM	40CFR 63-SS.998(d)	162	Recordkeeping Requirements
1-33001/-/MCM	40CFR 63-SS.999(c)	163	Reporting Requirements
1-33001/-/MCM	40CFR 63-SS.999(d)	164	NESHAP for Closed Vent Systems, Control Devices, etc. - Requests for Monitoring Alternatives
FACILITY	40CFR 63-UU.1036	58	Alternative means of emission limitation: Batch processes
FACILITY	40CFR 63-UU.1038(b)	59	NESHAP for Equipment Leaks - Control Level 2 - Recordkeeping - General equipment leak records
FACILITY	40CFR 63-UU.1038(c)(8)	60	Recordkeeping Requirements
FACILITY	40CFR 63-UU.1039	61	Reporting requirements
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction

FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.11(a)	187	Temporary Emission Sources
FACILITY	6NYCRR 201-1.15	188	Requirement to Commence Construction
FACILITY	6NYCRR 201-1.4	186	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 87, 88	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
1-14NC1/-/NC1	6NYCRR 202-1.1	112	Required emissions tests.
1-14NC2/-/NC2	6NYCRR 202-1.1	128	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 211.1	23	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	189	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR	26	General Process

	212.10(c)(4)(iii		Emission Sources - NOx and VOC RACT required at major facilities
1-14CC1	6NYCRR 212.3(b)	89	General Process Emission Sources - emissions from existing emission sources
1-14NC1	6NYCRR 212.3(b)	109	General Process Emission Sources - emissions from existing emission sources
FACILITY	6NYCRR 212.4(c)	24	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6(a)	25	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 228-1.1(a)(1)	27	Table 1- Coating line catigories
1-14CC1	6NYCRR 228-1.3(a)	90	Surface Coating General Requirements- Opacity
1-14NC1	6NYCRR 228-1.3(a)	110	Surface Coating General Requirements- Opacity
1-14NC2	6NYCRR 228-1.3(a)	126	Surface Coating General Requirements- Opacity
FACILITY	6NYCRR 228-1.3(b)(1)	28	General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3(b)(2)	29	General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3(c)	30	Surface Coating General Requirements- Prohibitions
FACILITY	6NYCRR 228-1.3(d)	31	Surface Coating General Requirements- Handling, storage and disposal
FACILITY	6NYCRR 228-1.4(d)	32	Class D Coating Lines
FACILITY	6NYCRR 228-1.4(d)(2)	33	VOC limits for magnetic wire, metal can, coil, vinyl and fabric
1-14CC1	6NYCRR 228-1.4(d)(2)	91	VOC limits for magnetic wire, metal can, coil, vinyl and fabric
1-14CC1/-/CC5/01531	6NYCRR 228-1.4(d)(2)	108	VOC limits for magnetic wire, metal can, coil, vinyl and fabric
FACILITY	6NYCRR 228-1.4(d)(3)	34	VOC limits for Paper Film & Foil coatings
1-14NC1/-/NC1	6NYCRR 228-1.5(a)	113	Requirments of VOC controls

1-14NC2/-/NC2	6NYCRR 228-1.5(a)	129	Requirments of VOC controls
1-14NC1/-/NC1	6NYCRR 228-1.5(b)	114	Natural gas incineration of VOCs
1-14NC2/-/NC2	6NYCRR 228-1.5(b)	130, 131	Natural gas incineration of VOCs
FACILITY	6NYCRR 228-1.6(a)	35	Surface coating VOC analysis.
FACILITY	6NYCRR 228-1.6(c)	36	Surface coating access for sampling
1-TANKS	6NYCRR 229.3(e)(2)(v)	183	Volatile organic liquid storage tanks
2-TANKS	6NYCRR 229.3(e)(2)(v)	184	Volatile organic liquid storage tanks

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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 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, VON ROLL USA INC has been determined to be subject to the following regulations:
40 CFR 60.740 (b)

40 CFR 60.744 (b)

40 CFR 60.747 (b)

40 CFR 60.747 (c)

40 CFR 63.10 (b) (2)

40 CFR 63.10 (c)

40 CFR 63.1036
Conditions under this section provide alternatives to the leak detection and repair standards of sections 63.1025 through 63.1033. They also describe the means of tracking changes of operation between the alternatives.

40 CFR 63.1038 (b)

40 CFR 63.1038 (c) (8)

40 CFR 63.1039

40 CFR 63.105

40 CFR 63.132 (f)

40 CFR 63.132 (g)

40 CFR 63.133 (a) (1)

40 CFR 63.133 (b) (1)

40 CFR 63.133 (f)

40 CFR 63.135 (b)

40 CFR 63.135 (c)

40 CFR 63.135 (e)

40 CFR 63.135 (f)

40 CFR 63.140

40 CFR 63.143 (a)

40 CFR 63.146 (c)

40 CFR 63.147 (b)

40 CFR 63.147 (f)

40 CFR 63.148 (d)
This condition requires the facility to repair any leaks found on a closed-vent or vapor collection system that is subject to the HON rule. This condition helps minimize the fugitive losses of organic hazardous air pollutants by ensuring that the facility repairs all leaks within 15 days. Adequate records also are required in order to keep track of the leaks in these systems.

40 CFR 63.148 (e)
This condition allows a facility that found leaks in a vapor collection system or closed-vent system to delay the repair of these leaks. The leaks may be delayed if doing so would create more emissions of organic hazardous air pollutants than otherwise would result from leaving the leak alone.

40 CFR 63.148 (g)

40 CFR 63.148 (h)

40 CFR 63.148 (i)

40 CFR 63.2445 (b)

This regulation requires that existing sources must comply with the requirements for this subpart no later than May 10, 2008.

40 CFR 63.2460 (b)

40 CFR 63.2460 (c)

40 CFR 63.2465 (b)

40 CFR 63.2480

40 CFR 63.2485

40 CFR 63.2520

40 CFR 63.2525

40 CFR 63.2535 (l)
This regulation sets forth the requirements for process unit groups that are subject to the miscellaneous organic manufacturing regulation under 40 CFR 63 Subpart FFFF.

40 CFR 63.3320 (b) (2)
This condition reduces the emissions of hazardous air pollutants by requiring the facility to meet an emission limit for organic HAP that are emitted from the coating processes. The facility must not emit more than 4% of the mass of the coating materials as organic HAP for existing sources and 1.6% for new sources.

The facility will prove that it is meeting this limit during the initial compliance demonstration that is also required as part of this subpart.

40 CFR 63.3320 (b) (3)
This condition reduces the emissions of hazardous air pollutants by requiring the facility to meet an emission limit for organic HAP that are emitted from the coating processes. The facility must not emit more than 20% of the mass of the coating solids as organic HAP for existing sources and 8% for new sources.

The facility will prove that it is meeting this limit during the initial compliance demonstration that is also required as part of this subpart.

40 CFR 63.3350 (f)

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 63.3370 (b)

40 CFR 63.3370 (c)

40 CFR 63.3370 (e)

40 CFR 63.3400 (c)

40 CFR 63.3400 (g)

40 CFR 63.3410

40 CFR 63.424

40 CFR 63.428

40 CFR 63.4291 (a)

40 CFR 63.4292 (b)

40 CFR 63.4293 (b)

40 CFR 63.4300 (a)

40 CFR 63.4300 (b)

40 CFR 63.4300 (c)
This section outlines the general requirements for facilities using an emission capture system and add-on control device to comply with the requirements of 40 CFR 63 Subpart OOOO.

40 CFR 63.4311 (a)

40 CFR 63.4311 (b)

40 CFR 63.4311 (c)

40 CFR 63.4312

40 CFR 63.4313

40 CFR 63.4351 (d)

40 CFR 63.4352

40 CFR 63.4364 (a)

40 CFR 63.4364 (b)

40 CFR 63.4364 (c)
This regulation sets forth the monitoring requirements for oxidizers used to meet the

emissions standards for facilities that are subject to the NESHAP for Printing, Coating and Dyeing of fabrics and other textiles.

40 CFR 63.4364 (e)
This regulation requires that a site specific monitoring plan be developed for the capture system used at the facility.

40 CFR 63.8000 (a)

40 CFR 63.8000 (b)

40 CFR 63.8000 (d)
This section describes exceptions to other parts of 40 CFR 63 for facilities that are subject to 40 CFR 63 Subpart HHHHH.

40 CFR 63.8005 (a)

40 CFR 63.8005 (d)

40 CFR 63.8005 (e)

40 CFR 63.8005 (g)

40 CFR 63.8015

40 CFR 63.8050 (d)

40 CFR 63.8055

40 CFR 63.8075 (e)

40 CFR 63.8080

40 CFR 63.982 (c) (2)

40 CFR 63.990 (a)

40 CFR 63.990 (c) (1)

40 CFR 63.990 (c) (2)

40 CFR 63.996 (c)

40 CFR 63.996 (d)

40 CFR 63.998 (a) (2)

40 CFR 63.998 (b)

40 CFR 63.998 (c) (1)

40 CFR 63.998 (c) (3)

40 CFR 63.998 (d)

40 CFR 63.999 (c)

40 CFR 63.999 (d)

40 CFR Part 63, Subpart DDDDD
This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP emissions. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

6 NYCRR 201-1.11 (a)
Criteria for temporary emission sources.

6 NYCRR 201-1.15
The existence of a valid permit shall not be construed as authorizing construction if construction is not commenced within 18 months after the date of permit issuance, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time as determined by the department. Up to an 18-month extension may be granted by the department upon a showing of good cause in a written request by the facility owner or operator. The department may suspend, modify or revoke the permit or registration pursuant to Part 621 of this Title if construction or

modification has not commenced within 18 months of issuance of such permit or registration, or construction has been discontinued for a period of more than 18 months at any point after issuance of such permit or registration.

6 NYCRR 211.1
This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212.10 (c) (4) (iii)
This section allows source owners who 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 (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 228-1.1 (a) (1)

6 NYCRR 228-1.3 (a)
This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (b) (1)
This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (b) (2)

6 NYCRR 228-1.3 (c)
This citation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

6 NYCRR 228-1.3 (d)
This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.4 (d)

Surface coating VOC limits

6 NYCRR 228-1.4 (d) (2)

6 NYCRR 228-1.4 (d) (3)
The citation specifies the maximum VOC content of a coating allowed when coating paper, film or foil.

6 NYCRR 228-1.5 (a)

6 NYCRR 228-1.5 (b)

6 NYCRR 228-1.6 (a)
This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirments of the regulation.

6 NYCRR 228-1.6 (c)
This citation permits Department personel to enter a facility at reasonable hours for the purpose of collecting samples to verify compliance with VOC content limit requirments.

6 NYCRR 229.3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

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

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
1-14CC1/-/CC4/KISS2	104	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	146	record keeping/maintenance procedures
1-14CC1/-/CC4/KISS2	105	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	147	record keeping/maintenance procedures
1-14CC1/-/CC4/KISS2	106	record keeping/maintenance procedures
1-14NC2/-/NC2/01050	148	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
1-33001	149	record keeping/maintenance procedures
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	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	record keeping/maintenance procedures
FACILITY	74	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
FACILITY	43	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	48	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
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
1-33001/-/MCM	167	monitoring of process or control device parameters as surrogate
1-33001/-/MCM	168	record keeping/maintenance procedures
1-33001/-/MCM	169	record keeping/maintenance procedures
1-33001/-/MCM	170	intermittent emission testing
1-33001/-/MCM	171	monitoring of process or control device parameters as surrogate
1-33001/-/MCM	172	record keeping/maintenance procedures
1-33001/-/MCM	173	monitoring of process or control device parameters as surrogate
1-33001/-/MCM	174	monitoring of process or control device parameters as surrogate
1-33001/-/MCM	175	record keeping/maintenance procedures
1-33001/-/MCM	176	record keeping/maintenance procedures
1-33001/-/MCM	178	record keeping/maintenance procedures
1-33001/-/MCM	179	record keeping/maintenance procedures
1-33001/-/MCM	180	record keeping/maintenance procedures
1-33001/-/MCM	181	record keeping/maintenance procedures
1-33001/-/MCM	182	record keeping/maintenance procedures
1-14CC1/-/CC1	92	record keeping/maintenance procedures
1-14CC1/-/CC4	97	record keeping/maintenance procedures
1-14CC1/-/CC1	93	record keeping/maintenance procedures
1-14CC1/-/CC4	98	record keeping/maintenance procedures
FACILITY	75	record keeping/maintenance procedures
FACILITY	76	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
1-14CC1/-/CC1	94	record keeping/maintenance procedures
1-14CC1/-/CC4	99	record keeping/maintenance procedures
FACILITY	78	record keeping/maintenance procedures
1-14CC1/-/CC1	95	record keeping/maintenance procedures
1-14CC1/-/CC4	100	record keeping/maintenance procedures
1-14CC1/-/CC4	101	record keeping/maintenance procedures
1-14CC1/-/CC1	96	record keeping/maintenance procedures
1-14CC1/-/CC4	102	record keeping/maintenance procedures
FACILITY	79	record keeping/maintenance procedures
FACILITY	80	record keeping/maintenance procedures
FACILITY	81	record keeping/maintenance procedures

FACILITY	82	record keeping/maintenance procedures
1-14CC1/-/CC5	107	record keeping/maintenance procedures
1-14NC1/-/CC2	111	record keeping/maintenance procedures
1-14NC1/-/NC1	115	record keeping/maintenance procedures
1-14NC2/-/CC3	127	record keeping/maintenance procedures
1-14NC2/-/NC2	132	record keeping/maintenance procedures
1-14NC2/-/NC2	133	record keeping/maintenance procedures
1-14NC1/-/NC1	116	monitoring of process or control device parameters as surrogate
1-14NC1/-/NC1	117	record keeping/maintenance procedures
1-14NC1/-/NC1	118	record keeping/maintenance procedures
1-14NC2/-/NC2	134	record keeping/maintenance procedures
FACILITY	83	record keeping/maintenance procedures
1-14NC1/-/NC1	119	record keeping/maintenance procedures
1-14NC2/-/NC2	135	record keeping/maintenance procedures
FACILITY	84	record keeping/maintenance procedures
1-14NC2/-/NC2	137	record keeping/maintenance procedures
FACILITY	85	record keeping/maintenance procedures
FACILITY	86	record keeping/maintenance procedures
1-14NC2/-/NC2	138	record keeping/maintenance procedures
1-14NC1/-/NC1	120	record keeping/maintenance procedures
1-14NC2/-/NC2	139	record keeping/maintenance procedures
1-14NC1/-/NC1	121	record keeping/maintenance procedures
1-14NC2/-/NC2	140	record keeping/maintenance procedures
1-14NC1/-/NC1	122	record keeping/maintenance procedures
1-14NC2/-/NC2	141	record keeping/maintenance procedures
1-14NC1/-/NC1	123	record keeping/maintenance procedures
1-14NC2/-/NC2	142	record keeping/maintenance procedures
1-14NC1/-/NC1	124	record keeping/maintenance procedures
1-14NC2/-/NC2/00OX2	144	record keeping/maintenance procedures
1-14NC1/-/NC1	125	record keeping/maintenance procedures
1-14NC2/-/NC2	143	record keeping/maintenance procedures
1-33001/-/MCM	150	record keeping/maintenance procedures
1-33001/-/MCM	151	record keeping/maintenance procedures
1-33001/-/MCM	152	record keeping/maintenance procedures
1-33001/-/MCM	153	record keeping/maintenance procedures
1-33001/-/MCM	154	record keeping/maintenance procedures
1-33001/-/MCM	155	monitoring of process or control device parameters as surrogate
1-33001/-/MCM	156	record keeping/maintenance procedures
1-33001/-/MCM	157	record keeping/maintenance procedures
1-33001/-/MCM	158	record keeping/maintenance procedures
1-33001/-/MCM	159	record keeping/maintenance procedures
1-33001/-/MCM	160	record keeping/maintenance procedures
1-33001/-/MCM	161	record keeping/maintenance procedures
1-33001/-/MCM	162	record keeping/maintenance procedures
1-33001/-/MCM	163	record keeping/maintenance procedures
1-33001/-/MCM	164	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
FACILITY	60	record keeping/maintenance procedures
FACILITY	61	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
1-14NC1/-/NC1	112	intermittent emission testing
1-14NC2/-/NC2	128	intermittent emission testing
FACILITY	7	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
1-14CC1	89	intermittent emission testing
1-14NC1	109	intermittent emission testing
FACILITY	24	intermittent emission testing
FACILITY	25	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
1-14CC1	90	monitoring of process or control device parameters

		as surrogate
1-14NC1	110	record keeping/maintenance procedures
1-14NC2	126	intermittent emission testing
FACILITY	28	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures
FACILITY	32	work practice involving specific operations
FACILITY	33	work practice involving specific operations
1-14CC1	91	monitoring of process or control device parameters as surrogate
1-14CC1/-/CC5/01531	108	monitoring of process or control device parameters as surrogate
FACILITY	34	work practice involving specific operations
1-14NC1/-/NC1	113	record keeping/maintenance procedures
1-14NC2/-/NC2	129	record keeping/maintenance procedures
1-14NC1/-/NC1	114	monitoring of process or control device parameters as surrogate
1-14NC2/-/NC2	130	record keeping/maintenance procedures
1-14NC2/-/NC2	131	monitoring of process or control device parameters as surrogate
FACILITY	35	record keeping/maintenance procedures
1-TANKS	183	record keeping/maintenance procedures
2-TANKS	184	record keeping/maintenance procedures

Basis for Monitoring

6NYCRR 228-1.3(a) **NO PERSON SHALL CAUSE OR ALLOW EMISSIONS HAVING AN AVERAGE OPACITY DURING ANY SIX CONSECUTIVE MINUTES OF 20 PERCENT OR GREATER FROM ANY PROCESS EMISSION SOURCE, EXCEPT ONLY THE EMISSION OF UNCOMBINED WATER. COMPLIANCE WILL BE DETERMINED BY CONDUCTING A METHOD 9 OPACITY EVALUATION AT A MINIMUM FREQUENCY OF ONCE PER HALF YEAR, WHILE THE SOURCE IS IN NORMAL OPERATING MODE.**

6 NYCRR 228-1.4(d)(2) **THE FACILITY MUST MAINTAIN AND, UPON REQUEST, PROVIDE THE DEPARTMENT WITH A CERTIFICATION FROM THE COATING SUPPLIER/MANUFACTURER WHICH LISTS THE PARAMETERS USED TO DETERMINE THE ACTUAL VOC CONTENT OF EACH AS APPLIED COATING USED AT THE FACILITY (228-1.3(B)(1)).**

6 NYCRR 228-1.4(d)(2) **THE FACILITY APPLYING COATINGS TO FABRIC MAY NOT USE COATINGS WITH VOC CONTENTS, AS APPLIED, THAT EXCEED THE LIMITS SPECIFIED IN TABLE D-1. THE UNITS IN TABLE D-1 ARE IN TERMS OF WEIGHT OF VOC PER GALLON OF COATING (MINUS WATER AND EXEMPT VOC). THE LIMITS IN TABLE D-1 CAN BE MET BY AVERAGING THE VOC CONTENT OF THE MATERIALS USED ON A SINGLE SURFACE COATING LINE (I.E., DAILY WITH IN-LINE AVERAGING).**

6 NYCRR 228-1.5(b) STACK TESTING OF JULY 2012 SHOWED COMPLIANCE WITH THE REQUIREMENTS OF 6 NYCRR 228-1.5(B). TO ENSURE CONTINUED COMPLIANCE WITH THE REQUIREMENTS, THE COMBUSTION CHAMBER TEMPERATURE OF THE OXIDIZER SHALL BE MAINTAINED ABOVE 900 C / 1652 F AND WILL BE MONITORED ON A CONTINUOUS BASIS USING AN ELECTRONIC RECORDER. RECORDER DATA MUST BE MAINTAINED AT THE FACILITY FOR A PERIOD OF FIVE YEARS.

40 CFR 63.4292(b), Subpart OOOO IF THE FACILITY USES A THERMAL OXIDIZER IN ORDER TO COMPLY WITH THE EMISSION RATE WITH ADD-ON CONTROLS OPTION, THE ORGANIC HAP OVERALL REMOVAL EFFICIENCY OPTION, OR THE OUTLET ORGANIC HAP CONCENTRATION OPTION, THEN THE FACILITY MUST NOT ALLOW THE AVERAGE TEMPERATURE IN ANY 3-HOUR BLOCK PERIOD TO FALL BELOW THE TEMPERATURE LIMIT
ESTABLISHED DURING THE PERFORMANCE TEST ACCORDING TO §63.4363(A).

Condition 136 FABRIC COATING LINES, INCLUDING BUT LIMITED TO: RUBBER THAT IS USED FOR RAINWEAR, TENTS, AND INDUSTRIAL GASKETS, MAYNOT USE COATINGS WITH VOC CONTENTS, AS APPLIED, WHICH EXCEED 2.9 POUNDS OF VOC PER GALLON OF COATING (MINUS WATER AND EXCLUDED COMPOUNDS).

6 NYCRR 228-1.4(d)(3) THE FACILITY APPLYING COATINGS TO PAPER FILM AND FOIL MAY NOT USE COATINGS WITH VOC CONTENTS, AS APPLIED, WHICH
EXCEED THE LIMITS SPECIFIED IN TABLE D-2. THE UNITS IN TABLE D-2 ARE IN TERMS OF WEIGHT OF VOC PER WEIGHT OF COATING APPLIED.
PRESSURE SENSITIVE TAPE AND LABEL SURFACE COATING 0.067 LB VOC / LB COATING
PAPER, FILM, AND FOIL 0.08 LB VOC / LB COATING

6 NYCRR 228-1.5(b) STACK TESTING OF JULY 2012 SHOWED COMPLIANCE WITH THE REQUIREMENTS OF 6 NYCRR 228-1.5(B). TO ENSURE CONTINUED COMPLIANCE WITH THE REQUIREMENTS, THE COMBUSTION CHAMBER TEMPERATURE OF THE OXIDIZER SHALL BE MAINTAINED ABOVE 877 C / 1610 F AND WILL BE MONITORED ON A CONTINUOUS BASIS USING AN ELECTRONIC RECORDER. RECORDER DATA MUST BE MAINTAINED AT THE FACILITY FOR A PERIOD OF FIVE YEARS. IN ADDITION, SEMIANNUAL REPORTS SHALL BE SUBMITTED TO THE DEPARTMENT REPORTING ALL PERIODS THAT THE TEMPERATURE OF THE OXIDIZER SYSTEM IS BELOW THE STATED VALUE.

40 CFR 60.744(e), NSPS Subpart VVV **EACH OWNER OR OPERATOR OF AN AFFECTED FACILITY CONTROLLED BY A THERMAL INCINERATOR AND DEMONSTRATING COMPLIANCE BY THE TEST METHODS DESCRIBED IN 60.743 (A)(1), (2), (B), OR (C) (WHICH INCLUDE CONTROL DEVICE EFFICIENCY DETERMINATIONS) SHALL INSTALL, CALIBRATE, MAINTAIN, AND OPERATE, ACCORDING TO THE MANUFACTURER'S SPECIFICATIONS, A MONITORING DEVICE THAT CONTINUOUSLY INDICATES AND RECORDS THE COMBUSTION TEMPERATURE OF THE INCINERATOR. THE MONITORING DEVICE SHALL HAVE AN ACCURACY OF PLUS OR MINUS ONE PERCENT OF THE TEMPERATURE BEING MEASURED IN CELSIUS DEGREES.**

40 CFR 63.8005(a), Subpart HHHHH **AS REQUIRED IN §63.8005, FOR EACH STATIONARY PROCESS VESSEL AT AN EXISTING SOURCE, THE FACILITY MUST EQUIP THE VESSEL WITH A COVER OR LID THAT MUST BE IN PLACE AT ALL TIMES THEN THE VESSEL CONTAINS HAP, EXCEPT FOR MATERIAL ADDITIONS AND SAMPLING. IN ADDITION, THE FACILITY MUST REDUCE EMISSIONS OF ORGANIC HAP WITH A VAPOR EXISTING PRESSURE GREATER THAN OR EQUAL TO 0.6 KPA BY AT LEAST 75% BY WEIGHT. THE 75% REDUCTION REQUIREMENT CONSIDERS BOTH CAPTURE AND ANY COMBINATION OF CONTROL DEVICES (EXCEPT A FLARE).**

40 CFR 63.8005(a), Subpart HHHHH **AS REQUIRED IN §63.8005, FOR EACH STATIONARY PROCESS VESSEL AT AN EXISTING SOURCE, THE FACILITY MUST EQUIP THE VESSEL WITH A COVER OR LID THAT MUST BE IN PLACE AT ALL TIMES THEN THE VESSEL CONTAINS HAP, EXCEPT FOR MATERIAL ADDITIONS AND SAMPLING.**
IN ADDITION, THE FACILITY MUST REDUCE EMISSIONS OF ORGANIC HAP WITH A VAPOR PARTIAL PRESSURE GREATER THAN 0.6 KPA BUT LESS THAN 17.2 KPA BY VENTING THE EMISSIONS THROUGH A CLOSED-VENT SYSTEM TO A CONDENSER THAT REDUCES THE OUTLET GAS TEMPERATURE TO < 2 DEGREES C.
TO DEMONSTRATE INITIAL COMPLIANCE WITH THIS LIMIT, THE FACILITY MUST CONDUCT THE PERFORMANCE TEST OR DESIGN EVALUATION UNDER CONDITIONS AS SPECIFIED IN §63.7(E)(1), EXCEPT THAT THE PERFORMANCE TEST OR DESIGN EVALUATION MUST BE CONDUCTED UNDER WORST-CASE CONDITIONS.
THE PERFORMANCE TEST MUST BE CONDUCTED ACCORDING TO THE PROCEDURES LISTED IN §63.1257(B)(8) FOR BATCH PROCESSES, INCLUDING THE SUBMITTAL OF A SITE-SPECIFIC TEST PLAN FOR APPROVAL PRIOR TO TESTING.