



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

**Permit ID: 5-0913-00110/00002**  
**08/01/2016**

**Facility Identification Data**

Name: BFG INTERNATIONAL USA, INC  
Address: 29 DISTRIBUTION WAY|IMPERIAL INDUSTRIAL PARK  
PLATTSBURGH, NY 12901

**Owner/Firm**

Name: BFG INTERNATIONAL USA, LLC  
Address: 29 DISTRIBUTION WAY  
IMPERIAL INDUSTRIAL PARK  
PLATTSBURGH, NY 12901, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

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29 DISTRIBUTION WAY  
PLATTSBURGH, NY 12901  
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**Permit Description**

**Introduction**

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

**Summary Description of Proposed Project**

The intent of this application is to convert the existing Air State Facility permit to a Title V permit.

Up to this point, BFG has operated under an Air State Facility Permit with federally enforceable caps limiting facility VOC and Hazardous Air Pollutant (HAP) emissions below major source thresholds to avoid



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the requirements of:

- 6 NYCRR 201-6: Title V Permits;
- 40CFR63, Subpart WWWW: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production;
- 40 CFR 63, Subpart PPPP: NESHAP for Surface Coating of Plastic Parts;
- 6 NYCRR 212.10: Reasonably Available Control Technology for major facilities; and
- 6 NYCRR Subpart 231-5: New Major Facilities And Modifications To Existing Non-Major Facilities In Nonattainment Areas, and Attainment Areas of the State within the Ozone Transport Region.

The facility became major for HAPs and subject to NESHAP requirements when it exceeded these caps, under EPA's "once in always in" policy. This initial Title V permit removes the obsolete caps on HAPs and identifies NESHAP and Title V permit requirements now applicable to this facility. A VOC cap of 47.5 tons per year has been added to this permit in order to maintain exception from Section 212.10 and Subpart 231-5 requirements listed above.

In addition, BFG requests approval of approximately 13 new contaminants. The Potential to Emit (PTE) for VOCs and HAPs will increase with the removal of the existing HAP caps. However, it is anticipated that maximum actual emissions will remain approximately the same due to the continuation of an annual mass emission limit on styrene. Styrene is the primary/limiting component in BFG's gel coat and resin materials. Existing potential short-term impacts should not increase since BFG is not adding any new production equipment or changes in process.

**Attainment Status**

BFG INTERNATIONAL USA, INC is located in the town of PLATTSBURGH in the county of CLINTON.

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*	TRANSPORT REGION (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.



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**Facility Description:**

BFG manufactures reinforced plastic composite parts and subassemblies predominantly used in the transportation and recreation industry. The Standard Industrial Classification Code (SIC code) for this facility is 3089 - Plastic Products, Not Elsewhere Classified and the corresponding NAICS code is 326199 - All Other Plastics Products Manufacturing. The primary methods of manufacture consist of gel coating molds, open and closed molding (i.e., resin transfer molding- RTM), and surface coating. These processes are conducted within the building in designated application booths and areas.

The facility is located on a 45.65 acre section at 29 Distribution Way in the City of Plattsburgh, New York. The site consists of a single manufacturing building with a number of small structures and garages. BFG International occupies approximately 40,000 square feet of the southwest corner of the building. The central area is the site of the gel coat, open molding, RTM and curing activities. The remainder of the area consists of chemical and finished part storage, trimming, finishing, bonding, painting, assembly, packaging, and maintenance activities. Facility emissions from these processes and activities consist of particulates, hazardous air pollutants (HAPs), and volatile organic compounds (VOCs). Particulate emissions are controlled by particulate filters at each exhaust stack. Emissions of volatile HAPs and VOCs from the facility are controlled by material limitations and operational techniques.

The facility's one permitted emission unit contains all operations, consisting of 7 different processes. In general, the processes include manufacturing with styrene and methyl methacrylate resin materials applied by spray equipment, by hand, and by resin transfer molding (RTM). Processes also include mold preparation, grinding, trimming, drilling, surface coating, bonding and other related processes. This emission unit consists of six emission points, labeled EF-01, EF-02, EF-03, EF-B1, EF-G1 and EFPR1. There are also several fugitive emission areas. Facility process emissions are also regulated under 6 NYCRR Parts 200, 212, and Subparts 228-1 & 2, General Provisions, General Process Emission Sources, and Commercial and Industrial Adhesive, Sealants and Primers, respectively

**Permit Structure and Description of Operations**

The Title V permit for BFG INTERNATIONAL 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.

BFG INTERNATIONAL USA, INC is defined by the following emission unit(s):

Emission unit U00001 - Composite fiberglass reinforced plastic manufacturing of flat panels



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for the transportation industry and plastic Whitewater parts.

Emission unit U00001 is associated with the following emission points (EP):  
EF-01, EF-02, EF-03, EF-B1, EF-G1, EFPR1

Process: P01 is located at Building Bld001 - Process P01 is a gel coat operation. Styrene-based catalyzed gel coats are applied to molds in a spray booth via non-atomized application techniques. The booth is approximately 14 feet wide by 30 feet deep, exhausting approximately 16,000 CFM through emission point EF-G1. The booth contains exhaust filters (ES GFLT1) for particulate control. The filters have a capture efficiency of approximately 99.6% as tested on atomized paint. The non-atomized gel coat application techniques utilized in this booth will result in an overspray particle size of more than 10 times the aerodynamic diameter of traditional atomized paint application. Capture of particulate overspray should easily be at or above 99.6% removal efficiency. Additionally, transfer efficiency and fall-out is estimated by the applicant at 90% and 95%, respectively. After the parts are gel coated they are allowed to cure adequately in the curing area (ES GCCUR) and then moved to either the hand lamination area (Process PO2) or the resin transfer molding (RTM) area (Process PO3). The curing area is exhausted through emission point EF-2 at approximately 16,000 CFM.

Materials used in this process will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions from this process.

Process: P02 is located at Building Bld001 - Process P02 is an open molding operation. In the open molding operation, a "barrier" or "skin" coat of filled resin may be applied via non-atomized methods to the gel coated surface. Following the skin coat, a mixture of filled styrene-based resin and fabric, pre-cut to the proper size, will then be applied via non-atomized methods to the surface. Hand rollers are used to remove air from the layup after sufficient layers of resin coated fiberglass mat are applied to the mold. Resin is generally mixed in various size containers depending upon the amount of layup to be performed. Smaller containers, usually 1 gallon open top cans, are then catalyzed at or near the point of application and applied by individuals by pouring and brushing and rolling the resin into glass fiber. The estimated maximum rate that resin can be applied is 175 pounds per hour of resin mixture. Four to six application stations (ES OAREA) will be in use at one time, depending on the size of the part being laminated. The resin infused material is allowed to polymerize and harden in the molding area. The open molding lamination/curing area will be ventilated by an exhaust fan, designated as emission point EF-01. Doors and windows will remain closed to ensure emissions are captured and exhausted through the stack.

Materials used in this process will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions from this process.

Process: P03 is located at Building Bld001 -

Process: P04 is located at Building Bld001 - Process P04 is a bonding operation. Various fiberglass reinforced parts, insulation, carpet and similar materials are bonded to one another in the Bonding Room (ES BOND1) with catalyzed bonding materials as well as solvent based adhesives. HAP and VOC species generated by this activity are exhausted by a fan, designated as emission point EF-B1.

Parts entering this operation may be a.) cleaned with a non-VOC/HAP containing wipe down solvent, b.) chemically bonded with other parts utilizing a VOC/HAP containing bonding putty or adhesive, or c.) touched up and readied for shipment or painting. Various VOC and HAP containing materials are applied



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by pump and by hand. Emissions of styrene and methyl methacrylate from bonding putties are calculated at 1%wt of available styrene and MMA, based upon vendor tests as well as closed molding emission factors. Other emissions of VOC and HAP are calculated to be 100% of available VOC/HAP. There are no emission controls associated with Bonding and Assembly. VOC and HAP emissions will predominately be exhausted by the fan designated as EF-B1, though some emissions will be fugitive exhausting through other process exhaust systems.

Materials used in this process will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions from this process.

Process: P06 is located at Building Bld001 - Production resins are transferred by hand from covered storage containers/tanks to up to five (5) covered mixing tanks (ES MXTKS) in the dispensing area. The mixing vessels will be covered except when material is being added or mixture removed. The mixed resin will then be transferred by hand from the mixing vessels to the point of use.

Process: P05 is located at Building Bld001 - Process P05 is a Resin Transfer Molding (RTM) operation. In the RTM process, partially cured gel coat molds are covered with an assortment of fiberglass mat materials which have been pre-cut to proper dimensions in the Fiber Layup area (ES LAYUP). After layup a second counter mold is placed over the previously gel coated mold holding the glass and the two are locked together. The counter mold may also be gel coated. Various resins, delivered from the mixing station, are then pumped with vacuum assist into the mold cavity filling the void space between the fiberglass mat and mold. Resin is generally mixed in 55-gallon drums and catalyzed as it is pumped.. The estimated maximum rate that resin can be applied is 175 pounds per hour of resin mixture. When the cavity is filled, as evidenced by the appearance of resin in the vacuum line, the pumping is halted, the lines sealed and the part is allowed to cure (ES RMINJ). Emissions from RTM are very low (applicant estimates MMA and Styrene emissions at 1% by weight). VOC and HAP emissions are exhausted by a fan designated as emission point EF-03, though some emissions may be fugitive..

Materials used in this process will be logged weekly. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions from this process. There will be no designated emission point for this source as all emissions are considered fugitive.

Process: P07 Process P07 is surface coating and texture coating operation. Surface coatings applied in this booth are generally not gel coats, texture coats may be gel coats. In the paint booth plastic parts are surface coated and texture coated. The booth is approximately 14 feet wide by 24 feet deep. The exhaust from the paint booth is approximately 17,150 CFM and is vented through emission point EF-PR1. The paint booth contains exhaust filters (ES PAINT) for particulate control. The filters have an approximate 99.6% removal efficiency as tested on atomized paint

Paint is applied via HVLP (High Volume Low Pressure) atomized spray equipment (ES HVLP4). The spray gun utilized is gravity fed cup guns with a cup capacity of approximately 10 fluid ounces. Texture coats may be applied by either non-atomized gel coat equipment or HVLP equipment. Regardless of application maximum operating time of each cup gun is 30 minutes per hour, usually 10 minutes application time per cup and 10 minutes clean and setup, yielding a usage rate of 60 fluid ounces per hour for each of two cup guns, or 120 fluid ounces per hour paint application. 120 fluid ounces is equivalent to 1.0 gallons at 12 pounds per gallon which results in a maximum application rate of 12 pounds per hour paint. When gel coat application equipment is used to apply texture coats the application rate will be equal to or less than 12 pound per hour. All VOCs and HAPs are assumed to be emitted to the atmosphere excepting catalyzed



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coatings.

Note, unlike paint surface coatings operations which are subject to 40 CFR 63, Subpart PPPP, texture gel coats operations are subject to 40 CFR 63, Subpart WWWW.

Materials used in this process will be logged daily. A monthly report completed within 30 days of the end of the month will be prepared detailing the VOC and HAP emissions from this process.

**Title V/Major Source Status**

BFG INTERNATIONAL USA, INC is subject to Title V requirements. This determination is based on the following information:

BFG will change their permit status from Air State Facility to Title V with the issuance of this permit. With the removal of the 9 tpy and 24 tpy caps on individual hazardous air pollutants (HAPs) and total HAPs, BFG is now a major source of HAPs. The Title V permit includes a 47.5 tpy cap on facility-wide volatile organic compounds, which allows BFG to avoid the requirements of 6NYCRR212.10 Reasonably available control technology for major facilities and 6NYCRR Subpart 231-5: New Major Facilities And Modifications To Existing Non-Major Facilities In Nonattainment Areas, and Attainment Areas of the State within the Ozone Transport Region.

**Program Applicability**

The following chart summarizes the applicability of BFG INTERNATIONAL 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	NO
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) -



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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



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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
3089	PLASTICS PRODUCTS, NEC

**SCC Codes**

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

SCC Code	Description
3-08-007-02	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Mould Release
3-08-007-04	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Adhesive Consumption
3-08-007-22	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Gel Coat-Spray On
3-08-007-23	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Resin-General-Roll On
3-08-007-36	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS FIBERGLASS RESIN PRODUCTS - RESIN CLOSED MOLDING
3-08-007-99	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - FIBERGLASS RESIN PRODUCTS Other Not Classified
4-02-022-40	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PLASTIC PARTS TOPCOAT/TEXTURE COAT APPLICATION

**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



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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
000098-29-3	1,2-BENZENEDIOL, 4-(1,1-DIMETHYLETHYL)-		> 0 but < 2.5 tpy
000110-43-0	2-HEPATANONE		>= 10 tpy but < 25 tpy
002786-76-7	2-NAPHTHALENECARBOXAMIDE, 4-[2-[4-(AMINOCARBONYL)PHENYL]DIAZENYL].....	2.92	
000108-10-1	2-PENTANONE, 4-METHYL		> 0 but < 10 tpy
000079-41-4	2-PROPANOIC ACID, 2-METHYL- (9CI)		> 0 but < 2.5 tpy
000108-65-6	2-PROPANOL, 1-METHOXY-, ACETATE		>= 10 tpy but < 25 tpy
000080-62-6	2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER	95000	
000123-86-4	ACETIC ACID, BUTYL ESTER		>= 10 tpy but < 25 tpy
001333-86-4	ACETYLENE BLACK		> 0 but < 2.5 tpy
021645-51-2	ALUMINUM HYDROXIDE	1.4	
007631-86-9	AMORPHOUS SILICA	7.36	
000062-53-3	ANILINE	16	
001309-64-4	ANTIMONY TRIOXIDE	1.75	
000100-61-8	BENZENAMINE N-METHYL- C7H9N	145	
000121-69-7	BENZENAMINE, N, N-DIMETHYL	31847	
000098-82-8	BENZENE, (1-METHYLETHYL)	438	
000095-63-6	BENZENE, 1,2,4-TRIMETHYL-		> 0 but < 2.5 tpy
000108-67-8	BENZENE, 1,3,5-TRIMETHYL-		> 0 but < 2.5 tpy
004083-64-1	BENZENESULFONYL ISOCYANATE, 4-METHYL-	3	
041556-26-7	BIS(1,2,2,6,6-PENTAMETHYL-4-PIPERIDYL) SEBACATE	876	
014059-33-7	BISMUTH VANADIUM OXIDE	7.3	
005567-15-7	BUTANAMIDE(DICHLORO, BIPHENYL) DIYL BIS AZO MIX		> 0 but < 2.5 tpy
012236-62-3	BUTANAMIDE, 2-[(4-CHLORO-2-NITROPHENYL)AZO]-N-(2,3-DIHYDRO-2-		> 0 but < 2.5 tpy
000085-68-7	BUTYL BENZYL PHTHALATE	450	
001345-16-0	C.I. PIGMENT BLUE 28	2.5	
001328-53-6	C.I. PIGMENT GREEN 7	0.876	



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000124-38-9	CARBON DIOXIDE		>= 250 tpy but < 75,000 tpy
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
007440-48-4	COBALT	0.456	
021041-93-0	COBALT HYDROXIDE	0.003	
000110-82-7	CYCLOHEXANE		>= 40 tpy but < 50 tpy
082919-37-7	DECANEDIOIC ACID, 1-METHYL 10-(1,2,2,6,6-PENTAMETHYL-4-PIPERIDINYL)...		> 0 but < 2.5 tpy
028182-81-2	DIISOCYANATE,1-6-HEXAMETHYLENE	100	
000131-11-3	DIMETHYL PHTHALATE	7500	
000067-64-1	DIMETHYL KETONE	50000	
000111-76-2	ETHANOL, 2-BUTOXY-		>= 2.5 tpy but < 10 tpy
000112-07-2	ETHANOL, 2-BUTOXY-, ACETATE	920	
000100-41-4	ETHYLBENZENE	1301	
000110-54-3	HEXANE	32412	
000136-52-7	HEXANOIC ACID, 2-ETHYL COBALT 2+	0.66	
064742-82-1	HYDRODESULFURIZED HEAVY NAPHTHA		>= 10 tpy but < 25 tpy
007722-84-1	HYDROGEN PEROXIDE		> 0 but < 2.5 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
064741-66-8	LIGHT ALKYLATE NAPHTHA		>= 10 tpy but < 25 tpy
001843-05-6	METHANONE,[2-HYDROXY-4-(OCTYLOXY)PHENYL]PHE NYL-		> 0 but < 2.5 tpy
000067-56-1	METHYL ALCOHOL	11948	
000078-93-3	METHYL ETHYL KETONE		> 0 but < 2.5 tpy
000101-68-8	METHYLENE BISPHENYL ISOCYANATE	0.219	
007789-82-4	MOLYBDATE, CALCIUM		> 0 but < 2.5 tpy
064742-95-6	NAPHTHA, LIGHT AROMATIC		>= 10 tpy but < 25 tpy
064742-88-7	NAPHTHA, MEDIUM ALIPHATIC		>= 2.5 tpy but < 10 tpy
064742-48-9	NAPHTHA HEAVY HYDROTREATED (PETROLEUM)		> 0 but < 2.5 tpy
027253-31-2	NEODECANOIC ACID, COBALT SALT	0.01	
000142-82-5	N-HEPTANE		>= 2.5 tpy but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES		> 0 but < 2.5 tpy
000107-41-5	PENTANEDIOL,METHYL	4993	
000094-36-0	PEROXIDE, DIBENZOYL		> 0 but < 2.5 tpy
0NY075-00-5	PM-10		> 0 but < 2.5 tpy
104810-48-2	POLYETHYLENE GLYCOL MONO-3-[3-(2H-BENZOTRIAZOL-2-YL)-5-TERT-BUTYL-4-HY	75	
000763-69-9	PROPANOIC ACID, 3-ETHOXY-, ETHYL ESTER		> 0 but < 2.5 tpy
014808-60-7	QUARTZ	0.28	
000980-26-7	QUINO ACIDRINE		> 0 but < 2.5 tpy
112926-00-8	DIONE,DIHYDRO,DIMETHYL MIX		
112945-52-5	SILICA GEL,CRYSTILINE FREE	7.36	
064742-89-8	SILICON DIOXIDE, AMORPHOUS	0.58	
	SOLVENT NAPHTHA, LIGHT		>= 2.5 tpy but < 10 tpy



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008052-41-3	ALIPHATIC		
000100-42-5	STODDARD SOLVENT		>= 25 tpy but < 40 tpy
007446-09-5	STYRENE	18000	
014807-96-6	SULFUR DIOXIDE		> 0 but < 2.5 tpy
013463-67-7	TALC		> 0 but < 2.5 tpy
013463-67-7	TITANIUM DIOXIDE		> 0 but < 2.5 tpy
000108-88-3	TOLUENE	19907	
0NY100-00-0	TOTAL HAP		>= 50 tpy but < 100 tpy
006846-50-0	TRIMETHYL-1,3- PENTANEDIOL		> 0 but < 2.5 tpy
	DIISOBUTYRATE, 2,2,4- C16H30O4		
0NY998-00-0	VOC	95000	
001330-20-7	XYLENE, M, O & P MIXT.	8998	

**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



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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



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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 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**Item L: Permit Exclusion - ECL 19-0305**



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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	60	Powers and Duties of the Department with respect to air pollution control
U-00001	40CFR 63-PPPP.4490(a)(1)	47	Plastic Parts and Products Surface Coating - Emission Limits
FACILITY	40CFR 63-PPPP.4501	36	Plastic Parts & Products Surface

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FACILITY	40CFR 63-PPPP.4520(a)	37	Coating NESHAP - General Provisions Plastic Parts & Products NESHAP - Semiannual reporting requirements
FACILITY	40CFR 63-PPPP.4530(a)	38	Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
U-00001	40CFR 63-PPPP.4531	48	Plastic Parts & Products Surface Coating NESHAP - Recordkeeping provisions
U-00001	40CFR 63-PPPP.4552	49	Plastic Parts & Products Surface Coating NESHAP - Emission Rate Without Add-on Controls - continuous compliance
U-00001	40CFR 63-WWWW.5810(c)	50	Reinforced Plastic Composites NESHAP - Options For Meeting Open Molding and Centrifugal Casting Emission Limits
U-00001	40CFR 63-WWWW.5895(c)	51	Reinforced Plastic Composites NESHAP - Continuous Compliance Demonstrations
U-00001	40CFR 63-WWWW.5900	52, 53	Reinforced Plastic Composites NESHAP - Continuous Compliance Demonstrations
FACILITY	40CFR 63-WWWW.5905	39	Reinforced Plastic Composites NESHAP - Notifications
FACILITY	40CFR 63-WWWW.5910(a)	40	Reinforced Plastic Composites NESHAP - Reports
FACILITY	40CFR 63-WWWW.5915	41	Reinforced Plastic Composites NESHAP - Recordkeeping
U-00001	40CFR 63-WWWW.5925	54	Reinforced Plastic Composites NESHAP - Subpart A General Provisions
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 201-1.4	61	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of



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				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, 42, 43		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 201-7	23		Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18		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	25		General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 212-1.3	26, 27, 28		Determination of Environmental Rating
U-00001	6NYCRR 212-1.5(f)	44		Process operations subject to 212-3 emitting A-rated VOC contaminants
FACILITY	6NYCRR 212-1.6(a)	29		Limiting of Opacity
FACILITY	6NYCRR 212-2.1(a)	62, 63, 64		HTACs applicable to Table 212-2.3 Table 4
FACILITY	6NYCRR 212-2.3(b)	65, 66		Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 212-2.4(b)	30		Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 212-3.1(a)	28		Reasonably Available Control Technology for Major Facilities
FACILITY	6NYCRR 215.2	9		Open Fires - Prohibitions



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FACILITY	6NYCRR 228-1.3(a)	31	Surface Coating General Requirements- Opacity
U-00001/-/P07	6NYCRR 228-1.3(b)(1)	57	General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3(d)	32	Surface Coating General Requirements- Handling, storage and disposal
FACILITY	6NYCRR 228-1.4(b)(5)	33	Miscellaneous Plastic Parts Coatings
FACILITY	6NYCRR 228-1.4(b)(6)	34	Automotive/Transporta tion and Business Machine Plastic Parts coatings
U-00001/-/P07	6NYCRR 228-1.6(a)	58	Surface coating VOC analysis.
U-00001/-/P07	6NYCRR 228-1.6(h)	59	Records reporting and maintaining
FACILITY	6NYCRR 228-2.4(a)	35	VOC Content Limits
FACILITY	6NYCRR 228-2.4(b)	67	Surface Preparation and Cleanup Solvents
U-00001	6NYCRR 228-2.4(d)	45	Work Practices
U-00001/-/P04	6NYCRR 228-2.5(a)	55	Recordkeeping Requirements for 228- 2.4(a)
U-00001	6NYCRR 228-2.5(c)	46	Maintain Records for 5 years
U-00001/-/P04	6NYCRR 228-2.7(b)	56	Container Labeling New Major Facilities and Mods to Existing Non-major Facilities in Nonattainment and Attainment Areas of the State in the OTR
FACILITY	6NYCRR 231-5	28	

**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



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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



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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 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.



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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, BFG INTERNATIONAL USA, INC has been determined to be subject to the following regulations:

40 CFR 63.4490 (a) (1)

This regulation contains an annual limitation on emissions of organic hazardous air pollutants from general use coating affected sources.

40 CFR 63.4501

This condition states which General Provisions apply to the facility.

40 CFR 63.4520 (a)

This section describes the semiannual reporting requirements and content for facilities subject to Subpart PPPP.

40 CFR 63.4530 (a)

This section states that the facility owner or operator must maintain a copy of each report submitted pursuant to Subpart PPPP. The facility owner or operator must also maintain a copy of any supporting documentation developed for the report.

40 CFR 63.4531

This section specifies the required format for records kept pursuant to Subpart PPPP. It also specifies how long a the facility owner or operator must retain records.

40 CFR 63.4552

This section describes the methods the facility owner or operator must use to demonstrate continuous compliance with the emission limitations in Subpart PPPP



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using the emission rate without add-on controls option.

40 CFR 63.5810 (c)

40 CFR 63.5895 (c)

This section states that the facility owner or operator must collect and keep records of resin and gel coat use, organic hazardous air pollutant content, and the operation where the resin is used.

40 CFR 63.5900

This section describes the methods the facility owner or operator must use to demonstrate continuous compliance with the standards in Subpart WWWW.

40 CFR 63.5905

This section describes the required notifications and the date by which the facility owner or operator must submit them.

40 CFR 63.5910 (a)

This section states that the facility owner or operator must submit each report that applies to the operations at the facility.

40 CFR 63.5915

This section describes the record keeping requirements for facilities subject to the requirements of Subpart WWWW.

40 CFR 63.5925

This section outlines which provisions of the National Emission Standards for Hazardous Air Pollutants (40 CFR 63 Subpart A) apply to facilities that are subject to Subpart WWWW.

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



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or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212-1.3

Based upon the following requirements, all air contaminants will assigned an Environmental Rating from A to D.

- (a) Toxic and other properties and emission rate potential of the air contaminant;
- (b) location of the process emission source or emission point(s) for the air contaminant with respect to residences or other sensitive environmental receptors, taking into account the area's anticipated growth;
- (c) emission dispersion characteristics at or near the process emission source or emission point(s), taking into account the physical location of the process emission source or emission point(s) relative to the surrounding buildings and terrain; and
- (d) the projected maximum cumulative impact of an air contaminant taking into account emissions from all process emission sources at the facility under review and the pre-existing ambient concentration of the air contaminant under review.

6 NYCRR 212-1.5 (f)

Facility owners or operators whose process operations emit VOCs and meet the applicability requirements of Subpart 212-3 of Part 212 are not subject to the control provisions in Subpart 212-2. However, if an individual air contaminant, as a component of total VOCs, is assigned an environmental rating of A, that individual air contaminant must meet the control requirements of Subpart 212-2.

6 NYCRR 212-1.6 (a)

This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.1 (a)

This provision is for an air contaminant listed in Section 212-2.2 Table 2 - High Toxicity Air Contaminant List (HTAC). The facility owner or operator must either limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in Subdivision 212-2.3(b), Table 4.



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6 NYCRR 212-2.3 (b)

Table 4 of 212-2.3 describes the reduction in emissions required for a non-criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of controlled applied.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 212-3.1 (a)

This provision states that owners and/or operators of facilities which emit volatile organic compounds or nitrogen oxides in amounts greater than the applicability emission rates found in 212-3(a)(1) and (2) must submit a plan to reduce those emissions and be in compliance by a specific date.

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 (d)



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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 (b) (5)

This regulation describes the emission limits for facilities operating a miscellaneous plastic parts coating line.

6 NYCRR 228-1.4 (b) (6)

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 requirements of the regulation.

6 NYCRR 228-1.6 (h)

This citation requires the facility owner or operator to divulge any information or record showing noncompliance with the requirements of the regulation to the Department within 30 days and to maintain this information on the premises for a period of 5 years.

6 NYCRR 228-2.4 (a)

This citation contains the VOC content limits for adhesives and sealants.

6 NYCRR 228-2.4 (b)

6 NYCRR 228-2.4 (d)

This regulation describes the work practices the owner or operator of a facility with total annual actual volatile organic compound emissions of three tons or more must follow to demonstrate compliance with Part 228-2.



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6 NYCRR 228-2.5 (a)

This regulation describes the record keeping requirements for facilities that are subject to a volatile organic compound limit in Section 228-2.4(a).

6 NYCRR 228-2.5 (c)

This regulation requires that the facility owner or operator maintain all records kept pursuant to Part 228-2 for at least five years, and that such records be made available to the Department upon request.

6 NYCRR 228-2.7 (b)

This regulation describes the method used to calculate the volatile organic compound content of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6 NYCRR Subpart 231-5

This Subpart applies to new major facilities and modifications to existing non-major facilities in non-attainment areas and attainment areas of the State within the Ozone Transport Region (OTR).

**Compliance Certification**

**Summary of monitoring activities at BFG INTERNATIONAL USA, INC:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
U-00001	47	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
U-00001	49	record keeping/maintenance procedures
U-00001	50	record keeping/maintenance procedures
U-00001	51	record keeping/maintenance procedures
U-00001	53	record keeping/maintenance procedures



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FACILITY	39	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
FACILITY	28	work practice involving specific operations
U-00001	44	record keeping/maintenance procedures
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	62	record keeping/maintenance procedures
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
FACILITY	65	intermittent emission testing
FACILITY	66	record keeping/maintenance procedures
FACILITY	30	intermittent emission testing
FACILITY	31	monitoring of process or control device parameters as surrogate
U-00001/-/PO7	57	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
U-00001/-/PO7	58	record keeping/maintenance procedures
U-00001/-/PO7	59	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures
U-00001	45	record keeping/maintenance procedures
U-00001/-/PO4	55	record keeping/maintenance procedures
U-00001	46	record keeping/maintenance procedures
U-00001/-/PO4	56	record keeping/maintenance procedures

**Basis for Monitoring**

Title V permits must contain sufficient monitoring, including periodic monitoring, to assure compliance with the applicable requirements in the permit. In order to provide reasonable assurance of compliance for the following applicable requirements, facility specific operating/monitoring conditions, including recordkeeping and reporting, were incorporated in this permit. The basis of this monitoring is provided below:

**6NYCRR 201-6.4(c) (3) (ii):**

The requirements specified in this condition reflect the requirements of 40 CFR 70 Operating Permit Program, Subpart 70.6, for title V facility permits. BFG must submit semi-annual reports, certified by a responsible official, identifying any deviations from the requirements specified in their title V permit. Reports for excess emissions of HAPs that continue for more than one hour and excess emissions of regulated air pollutants that continue for more than two hours, must be submitted within 24 and 48 hours, respectively. Semiannual reports must also include the results of emission testing conducted during the previous six months. This is also the



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basis for the semiannual reporting requirement specified for the applicable requirements identified below.

**6 NYCRR 201-7:**

BFG is required to track the usage of VOC containing materials on a weekly basis to verify compliance with the 47.5 tpy cap on facility-wide VOC emissions. The purpose of this cap is to avoid the requirements of 6 NYCRR 212.10, Reasonably Available Control Technology (RACT) for Major Facilities and 6NYCRR Subpart 231-5: New Major Facilities and Modifications to Existing Non-Major Facilities in Nonattainment Areas, and Attainment Areas of the State within the Ozone Transport Region. Each month, usage records must be used to calculate monthly VOC emissions and the 12-month rolling total VOCs. The annual rolling total, determined by summing the individual monthly VOC emissions during any consecutive 12-month period, must be compared to the limit. Records must be maintained on-site for five years and be available for review by the Department or USEPA upon request.

**6 NYCRR 212-1.3**

**Condition 26**

Annual mass emission limits have been assigned to the contaminants listed in this condition in order to reduce predicted annual impacts below the Department's allowable Annual Guideline Concentration (AGC). These contaminants are typically assigned an initial toxic rating of moderate (i.e., "B"-rated). Since the predicted impacts are below the Short-term Guideline Concentration (SGC) and AGC, this supports a contaminant rating of "B" and demonstrates compliance with the required level of control. BFG will calculate the contaminants' emissions on a monthly basis in order to verify the 12-month total emissions remain below the specified annual mass emission limits.

**Condition 28**

BFG is located near a residential area which could be affected by offsite emissions of styrene. Based on NYSDEC's short-term and annual guideline concentrations, the maximum short-term and annual ambient concentrations of styrene, based on AerScreen modeling, were predicted to be below concentrations that could cause acute and chronic health effects. However, short-term ambient impacts are estimated to exceed the average odor threshold concentration for styrene. Since a 211.1 nuisance (with respect to styrene odors) has never been documented at current production levels, the existing annual mass emission limit (formerly a HAP cap on styrene) supports assigning styrene an environmental rating of "B". This condition establishes an enforceable limit on the facility's Potential to Emit (PTE). BFG will calculate styrene emissions on a monthly basis in order to verify the 12-month total emissions remain below the specified annual



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mass emission limits. This rating may be increased to an A, if styrene odors later become a problem.

**Condition 27**

Emission Rate Potentials (ERP) and actual emission estimates are based on published non-atomized gel coat spray emission factors. These emission estimates are the basis for determining required control levels and demonstrating compliance with emission limits associated with reactive-type VOCs. This condition requires BFG to use and properly operate only non-atomized gel coat spray methods in accordance with the manufacturer's directions.

**6 NYCRR 212-1.6(a); 6 NYCRR 212-2.4(b); 6 NYCRR 228-1.3(a)**

At the Department's discretion, these conditions require stack testing of emission points with B & C - rated particulates to determine compliance with the particulate limit of 0.05 grains/dry standard cubic foot of exhaust gas and/or 20% opacity. The monitoring frequency is justified by the fact that these sources have good particulate emission control equipment.

To ensure compliance with particulate standards, BFG uses particulate filters certified by the manufacturer to minimum 99.6% efficiency on all emission points with a potential to emit particulate.

The facility shall conduct inspections of the particulate filters and maintain/replace filters in accordance with the manufacturer's specifications. Inspections/maintenance must be recorded weekly in a logbook for each emission point. Since these control devices are relatively simple filters, and not prone to frequent malfunctions, weekly maintenance is believed to be sufficient to prevent excessive ambient impacts from occurring.

**6 NYCRR 228-1.4(b) (5); 6 NYCRR 228-1.4(b)(6); 6 NYCRR 228-2.4(a); 6 NYCRR 228-2.7(b)**

BFG shall comply with VOC content limits for the various plastic parts coating and adhesive as specified in these conditions. For each coating and adhesive used, BFG shall use vendor data to perform calculations needed to demonstrate compliance. BFG shall maintain information and records demonstrating compliance with VOC content and must submit copy of records upon request.

**6 NYCRR 212-2.1(a)**



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For High Toxicity Air Contaminants (HTAC) listed in these conditions, BFG shall limit actual annual emissions from all process operations not to exceed the specified mass emission limit. Material usage containing these contaminants shall be recorded weekly and emissions calculated within 30 days of the end each month. The frequency of the monitoring required should be sufficient to alert BFG in advance of exceeding an HTAC threshold that would require an additional toxic impact analysis (TIA).

**6 NYCRR 212-2.3(b)**

These processes may emit particulates which are given an environmental rating of “A” per 6 NYCRR 212-1.3 and are required, based on ERPs, to achieve 90, 99 or 99.5 % control.

To ensure compliance with the required control, BFG shall use particulate filters certified by the manufacturer to minimum 99.6% efficiency on all emission points with a potential to emit an “A”-rated particulate.

The facility shall conduct inspections of the particulate filters and maintain/replace filters in accordance with the manufacturer’s specifications. Inspections/maintenance must be recorded weekly in a logbook for each emission point. Since these control devices are relatively simple filters, and not prone to frequent malfunctions, weekly maintenance is believed to be sufficient to assure compliance with these standards.