



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 6-3020-00024/00061

Renewal Number: 3

11/27/2017

Facility Identification Data

Name: HARDEN FURNITURE, LLC

Address: 8550 MILL POND WAY

MCCONNELLSVILLE, NY 13401

Owner/Firm

Name: HARDEN FURNITURE LLC

Address: 8550 MILL POND WAY

Mc Connellsville, NY 13401, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: TODD J PHILLIPS

Address: NYSDEC - UTICA SUBOFFICE

207 GENESEE ST

UTICA, NY 13501

Phone:

Division of Air Resources:

Name: CHRISTOPHER J SEDLACK

Address: NYSDEC - UTICA SUBOFFICE

207 GENESEE ST

UTICA, NY 13501

Phone:3157932554

Air Permitting Facility Owner Contact:

Name: ANDREW CLARK

Address: 8550 MILL POND WAY

MC CONNELLSVILLE, NY 13401

Phone:3152451000

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 project is the development of Renewal #3, a Title V Air Permit.

Attainment Status

HARDEN FURNITURE, LLC is located in the town of ANNSVILLE in the county of ONEIDA.



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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.

Facility Description:

Harden is a manufacturer of wood furniture.

Permit Structure and Description of Operations

The Title V permit for HARDEN FURNITURE, LLC

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.

HARDEN FURNITURE, LLC is defined by the following emission unit(s):

Emission unit OPOWER - This emission unit consists of the operation of two wood-fired boilers; most (not all) wood fuel is produced onsite from the sawmill and other woodworking operations. PM emissions from each boiler are controlled by a dedicated set of two Zurn multiclones in series (four multicyclones total). Maximum heat input of boilers: Boiler #2 (middle boiler) = 41.54 MMbtu/hr, Boiler #3 (right side) = 27.6 MMbtu/hr. Harden is a major source due to NOx potential that exceeds 100 ton/yr. This emission unit also embodies the operation of emergency diesel engines for fire protection and for electricity generation.



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The boiler house has a third 14.6 MMBtu/hr boiler (former BW1, on the extreme left side) that is no longer permitted to operate due to its inability to pass a PM performance test.

Emission unit 0POWER is associated with the following emission points (EP):
00016, 00600

Process: BW2 is located at first, Building 15 - This Process is the operation of Boiler #2. Wood fuel that partially is generated from the sawmill and woodworking operations is combusted to produce steam. PM emissions are controlled by two Zurn multiclones in series. Maximum heat input is 41.54 MMBtu/hr. This boiler is NOT subject to 40 CFR 60 Subpart Dc, due to installation prior to 6/9/89.

Process: BW3 is located at Building 15 - This process is the operation of Boiler #3. Wood fuel that partially is generated from the sawmill and woodworking operations is combusted to produce steam; the maximum heat input is 27.6 MMBtu/hour. PM emissions are controlled with two cyclones in series. This boiler commenced operation on 1/1/1999, which was later than the 40 CFR 60 Subpart Dc threshold date of 6/9/1989, so this unit is subject to Subpart Dc.

Process: ENG is located at 43, 17, creek, wtank - This process is the operation of emergency diesel engines to drive either emergency electrical generators or emergency water pumps for fire protection. These engines are exempt in Part 201-3, but subject to 40 CFR 63 Subpart ZZZZ.

Emission unit 0FINIS - This emission unit involves all of the surface coating operations (Part 228-1) of wood furniture at Harden. In Part 228, Harden falls into Table C-2. A moving finishing line consists of a series of spray booths and drying ovens; some booths are stand-alone. Various stains, wash coats, glazes, and lacquers are applied and dried. Harden is a major source for VOC, as the PTE exceeds 50 ton/yr. Adhesives (Part 228-2) are also applied in the assembly area.

Emission unit 0FINIS is associated with the following emission points (EP):
00022, 02401, 02402, 02403, 02404, 02411, 02412, 02421, 02422, 02431, 02432, 02441, 02442, 02443, 02444, 02451, 02452, 02461, 02471, 02481, 02491, 02492, 24111

Process: FC1 is located at FIRST, Building 25 - In this process, various stains, wash coats, glazes, sealers and lacquers are applied in spray booths and dried in drying ovens in an assembly line operation. Finished furniture with minor finish defects is touched up in the repair booth.

Location of FC1 area: This work area is the main coating line which is comprised of numerous spray booths (furniture moves on railcars) and also a long heated drying tunnel (runs along the west extreme of the building).

Process: FL1 is located at FIRST, Building 24 - In this process, large furniture pieces are removed from the moving finishing line at various stages and moved to the large piece spray booths to facilitate the application of various coatings. These pieces are then either returned to the moving finishing line or they are immediately completed. Without capping, FL1 would be subject to NSR.

Location of FL1 area: This work area is located at the extreme north end of the coating building; it is comprised of three booths that do not utilize railcars. FL1 has been known to Harden as "Room #2".

Process: FS1 is located at FIRST, Building 24 - This process consists of the coating operations in what Harden calls the "#2 Lacquer Booth". Without capping, FS1 would be subject to NSR.

Location of FS1 area: This work area is a U-shaped coating/drying line (it utilizes railcars) that is at the of FL1 as you face north. The rail track enters on the right leg of the U and the spray booth occurs immediately at the beginning. The rest of the U is a drying tunnel with finished furniture leaving on the left



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leg of the U.

Note: Since approximately the 2000s, FS1 has seen almost no usage - aside from a rare spraying event, it is used for cold storage. Nonetheless, FS1 is fully permitted to operate.

Process: FW1 is located at FIRST, Building 24 - This process consists of the stripping of rejected finish from a furniture item and then the returning of that piece to the front end of the coating line for re-coating. This process repairs flawed finishes.

Title V/Major Source Status

HARDEN FURNITURE, LLC is subject to Title V requirements. This determination is based on the following information:

The PTE for VOC exceeds 50 tpy and the PTE for NOx exceeds 100 tpy.

Program Applicability

The following chart summarizes the applicability of HARDEN FURNITURE, LLC 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).



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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 212-3, 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

2511	WOOD HOUSEHOLD FURNITURE
2512	UPHOLSTERED HOUSEHOLD FURNITURE
2521	WOOD OFFICE FURNITURE



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SCC Codes

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

SCC Code	Description
1-03-009-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/ INDUSTRIAL COMMERCIAL/ INSTITUTIONAL BOILER - WOOD/BARK WASTE Wood/Bark Fired Boiler
2-03-001-01	INTERNAL COMBUSTION ENGINES - COMMERCIAL/ INSTITUTIONAL COMMERCIAL/ INSTITUTIONAL IC ENGINE - DISTILLATE OIL (DIESEL) Reciprocating
4-02-019-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - WOOD FURNITURE SURFACE COATING Coating Operation
6-82-400-30	MACT MISCELLANEOUS PROCESSES PAINT STRIPPER USERS - CHEMICAL STRIPPERS APPLICATION, DEGRADATION, AND COATING REMOVAL STEPS

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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000084-74-2	1,2- BENZENEDICAR BOXYLIC ACID, DIBUTYL ESTER	10			
000107-21-1	1,2-ETHANEDIOL	92			
052299-20-4	1-PROPANOL, 2- (HYDROXYMET				



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005131-66-8	HYL)AMINO)-2-METHYL C5H13NO2 2 - PROPANOL BUTOXY	
000111-77-3	2-(2-METHOXYETHOXY)-ETHANOL	2
034375-28-5	2-(HYDROXYMETHYLAMINO)ETHANOL C3HGNO2	
000096-29-7	2-BUTANONE, OXIME	
000108-01-0	2-DIMETHYLAMINOETHANOL	
000110-43-0	2-HEPATANONE	
000110-12-3	2-HEXANONE, 5-METHYL	
000108-10-1	2-PENTANONE, 4-METHYL	4003
000107-98-2	2-PROPANOL, 1-METHOXY	
000108-65-6	2-PROPANOL, 1-METHOXY-, ACETATE	
002807-30-9	2-PROPOXYETHANOL	5000
000108-83-8	4-HEPTANONE, 2,6-DIMETHYL-	
000108-05-4	ACETIC ACID ETHENYL ESTER	0.002
000109-60-4	ACETIC ACID PROPYL ESTER	
000631-61-8	ACETIC ACID, AMMONIUM SALT	
007664-41-7	AMMONIA	
007631-86-9	AMORPHOUS SILICA	
000062-53-3	ANILINE	1
000098-82-8	BENZENE, (1-METHYLETHYL)	100
000095-63-6	BENZENE, 1,2,4-TRIMETHYL-	
000071-36-3	BUTANOL	
000085-68-7	BUTYL BENZYL PHTHALATE	
007440-44-0	CARBON	
000124-38-9	CARBON DIOXIDE	71488
0NY750-00-0	CARBON DIOXIDE	1639
000630-08-0	EQUIVALENTS CARBON MONOXIDE	
009004-70-0	CELLULOSE NITRATE	
007440-47-3	CHROMIUM	5
007440-48-4	COBALT	10
007440-50-8	COPPER	
002528-36-1	DIBUTHYL	



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000075-09-2	PHENYL PHOSPHATE DICHLOROMETH	2257
000067-64-1	ANE DIMETHYL KETONE	
026472-00-4	DIMETHYLDICLO PENTADIENE	
000111-90-0	ETHANOL, 2- (2- ETHOXYETHOXY)	357
000112-34-5	ETHANOL, 2-(2- BUTOXYETHOXY)-	481
000111-46-6	ETHANOL, 2,2'- OXYBIS-	1
000111-76-2	ETHANOL, 2- BUTOXY-	3296
000141-78-6	ETHYL ACETATE	
000064-17-5	ETHYL ALCOHOL (ETHANOL)	
000100-41-4	ETHYLBENZENE	2027
000050-00-0	FORMALDEHYDE	60
008006-61-9	GASOLINE	
000110-54-3	HEXANE	100
000110-19-0	ISOBUTYL ACETATE	
000078-83-1	ISOBUTYL ALCOHOL	
000108-21-4	ISOPROPYL ACETATE	
000067-63-0	ISOPROPYL ALCOHOL	
008008-20-6	KEROSENE	
007439-92-1	LEAD	
007439-96-5	MANGANESE	1
001317-35-7	MANGANESE OXIDE	400
005280-66-0	MANGANESE, NAPHTHENE CARB OXYLIC ACID COMPLEX	
012427-38-2	MANGANESE,((1, 2- ETHANEDIYLBIS(CARBAMODITHI OATO))2-)-	
000067-56-1	METHYL ALCOHOL	8871
000078-93-3	METHYL ETHYL KETONE	12489
064742-94-5	NAPHTHA HEAVY AROMATIC	
064742-48-9	NAPHTHA HEAVY HYDROTREATED (PETROLEUM)	
064742-88-7	NAPHTHA, MEDIUM ALIPHATIC	
008030-30-6	NAPHTHA	
0NY210-00-0	OXIDES OF	



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	NITROGEN	
0NY075-00-0	PARTICULATES	
064741-88-4	PETROLEUM	
	DISTILLATES(HE	
	AVY,PARAFFINIC	
)	
007664-38-2	PHOSPHORIC	
	ACID	
0NY075-00-5	PM-10	
000075-56-9	PROPANE, 1,2-	9
	EPOXY-	
000097-85-8	PROPANOIC	
	ACID, 2-METHYL-	
	, 2-	
	METHYLPROPYL	
	ESTER	
000763-69-9	PROPANOIC	
	ACID, 3-ETHOXY-	
	, ETHYL ESTER	
014808-60-7	QUARTZ	
064742-89-8	SOLVENT	
	NAPTHA, LIGHT	
	ALIPHATIC	
008052-41-3	STODDARD	
	SOLVENT	
007446-09-5	SULFUR DIOXIDE	
000108-88-3	TOLUENE	8509
0NY100-00-0	TOTAL HAP	49500
0NY998-00-0	VOC	
001330-20-7	XYLENE, M, O &	9896
	P MIXT.	
000557-05-1	ZINC STEARATE	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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 B: 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 C: 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



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the document are true, accurate, and complete.

- Item D: 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 E: 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 F: 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 G: 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 H: 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 I: 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



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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 J: 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 K: 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.



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Item L: 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: 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_02

Item B: 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.



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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	62	Powers and Duties of the Department with respect to air pollution control
0-POWER/-/BW3	40CFR 60-A.7(a)(4)	59	Notification and Recordkeeping
0-POWER/-/BW3	40CFR 60-A.7(b)	60	Notification and Recordkeeping
FACILITY	40CFR 60-Dc.48c(g)(2)	46	Alternative recordkeeping
0-POWER/-/BW3	40CFR 60-Dc.48c(i)	61	Reporting and Recordkeeping Requirements.
FACILITY	40CFR 63-JJJJJJ.11223(b)	47	ICI Boiler Area Source NESHAP - Tune-up Procedures
FACILITY	40CFR 63-ZZZZ.Table(2)(48	Requirements for Existing Compression Ignition Stationary RICE Located at Area Sources of HAP Emissions
0-POWER	40CFR 64	58	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 64.7	49, 50, 51	CAM - Operation of approved monitoring
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, 21	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	63	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 201-3.2(c)(6)	22	Exempt Activities - emergency power



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FACILITY	6NYCRR 201-3.3(a)	14	generating units
FACILITY	6NYCRR 201-3.3(c)	23, 24	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	25, 52, 53	Trivial Activities - list of trivial activities
FACILITY	6NYCRR 201-6.4(a)(4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)(2)	4	Recordkeeping and Reporting of Compliance Monitoring 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)	26	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	27, 54, 55	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	32	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	64, 65	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 226	33	SOLVENT METAL CLEANING PROCESSES
FACILITY	6NYCRR 226.2	34	General Requirements
FACILITY	6NYCRR 227-1.2(a)(4)	35, 36	Particulate Emissions Firing Solid Fuels.
FACILITY	6NYCRR 227-1.3(a)	37	Smoke Emission Limitations.
FACILITY	6NYCRR 228-1.1(b)(9)	38	55 gallons- or 400 pounds VOC
FACILITY	6NYCRR 228-1.3(a)	39	Surface Coating General Requirements-
0-FINIS	6NYCRR 228-1.3(b)(1)	56	Opacity General Requirements - Record Keeping
0-FINIS	6NYCRR 228-1.3(d)	57	Surface Coating General Requirements-



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FACILITY	6NYCRR 228-1.4(c)(2)	40	Handling, storage and disposal
FACILITY	6NYCRR 228-1.4(c)(3)	41, 42, 43, 44	Wood finishing HVLP requirement
FACILITY	6NYCRR 228-1.4(c)(4)	45	Wood finishing VOC limits (low VOC or high solids options) Equipment cleaning work practice plan requirements

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



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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,



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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.



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Facility Specific Requirements

In addition to Title V, HARDEN FURNITURE, LLC has been determined to be subject to the following regulations:

40 CFR 60.48c (g) (2)

This regulation allows the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

40 CFR 60.48c (i)

This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

40 CFR 60.7 (a) (4)

40 CFR 60.7 (b)

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

40 CFR 63.11223 (b)

This condition states what procedures an owner or operator of an industrial, commercial, or institutional boiler must follow to demonstrate continuous compliance with the tune-up requirements

40 CFR 63.Table (2) (d)

40 CFR 64.7

This section states the general requirements of operating and maintaining the monitoring system approved under the facility's CAM Plan.

40 CFR Part 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control



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device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

6 NYCRR 201-3.2 (c) (6)

The following emergency power generating units are exempt from permitting requirements:

- (i) Facility specific emergency power generating units where each individual unit operates for no more than 500 hours per year.
- (ii) Centrally dispatched emergency power generating units where each individual unit operates for no more than 200 hours per year. Should a centrally dispatched emergency power generating unit be also operated as a facility specific emergency power generating unit, the annual 200 hour centrally dispatched operating time limit remains applicable, and the total combined hours for operating as either type of emergency power generating unit shall be for no more than 500 hours.

6 NYCRR 201-3.3 (c)

This section list the specific activities which are defined as trivial.

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 226.2

6 NYCRR 227-1.2 (a) (4)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units which fire solid fuels at variable sizes of heat input (mmBtu/hr).

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 228-1.1 (b) (9)



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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)

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 (c) (2)

6 NYCRR 228-1.4 (c) (3)

6 NYCRR 228-1.4 (c) (4)

6 NYCRR Part 226

This regulation specifies the general requirements, equipment specifications and operating requirements for open-top vapor, conveyORIZED and cold cleaning degreasers.

6 NYCRR Subpart 201-7



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

Compliance Certification

Summary of monitoring activities at HARDEN FURNITURE, LLC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
0-POWER/-/BW3	59	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures
0-POWER/-/BW3	61	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
FACILITY	48	work practice involving specific operations
0-POWER	58	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	monitoring of process or control device parameters as surrogate
FACILITY	51	monitoring of process or control device parameters as surrogate
FACILITY	21	record keeping/maintenance procedures
FACILITY	22	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	28	work practice involving specific operations
FACILITY	29	work practice involving specific operations
FACILITY	30	work practice involving specific operations
FACILITY	31	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
FACILITY	65	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	35	intermittent emission testing
FACILITY	36	intermittent emission testing
FACILITY	37	monitoring of process or control device parameters as surrogate
FACILITY	38	monitoring of process or control device parameters as surrogate
FACILITY	39	monitoring of process or control device parameters as surrogate
0-FINIS	56	record keeping/maintenance procedures
0-FINIS	57	record keeping/maintenance procedures
FACILITY	41	monitoring of process or control device parameters as surrogate
FACILITY	42	monitoring of process or control device parameters as surrogate
FACILITY	43	monitoring of process or control device parameters as surrogate
FACILITY	44	monitoring of process or control device parameters as surrogate
FACILITY	45	record keeping/maintenance procedures

Basis for Monitoring

Condition 14: 6 NYCRR 201-3.2(c)(6) Reason is self-explanatory

Condition 20: 6 NYCRR 211.1 These are required equipment specs for cold cleaning degreasers



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Condition 22: 6 NYCRR 227-1.2(a)(4) This PM limit comes straight from this Reg

Condition 23: 6 NYCRR 227-1.2(a)(4) This PM limit comes straight from the Reg

Condition 24: 6 NYCRR 227-1.3(a) This places a 20% opacity limit on the two stacks for the two boilers
Condition 25: 6 NYCRR 228-1.1(b)(9) Part 228 allows up to 55 gallons of a non-compliant coating to be applied annually

Condition 26: 6 NYCRR 228-1.3(a) This places a 20% opacity limit on each of the stacks for the coating spray booths

Conditions 28, 29, 30 & 31: 6 NYCRR 228-1.4(c)(3) These four conditions require Harden to use compliant coatings on any coatings that fall into these four categories. Other coatings do not have VOC-content limitations.

Condition 32: 6 NYCRR 228-1.4(c)(4) Harden is required to develop a work practice plan to minimize VOC emissions.

Condition 33: 40 CFR 60.48(g)(2) Woork fuel consumption for BW3 shall be minitored and recorded.

Condition 34: 40 CFR 63.11223(b) Both boilers shall be tuned up once each two years.

Condition 35: 40 CFR 63.Table (2)(d) The four RICE diesel engines shall have oil/filter changes and belt/hose inspections per the listed timeframes.

Conditions 36 & 37: 40 CFR 64.7 These conditions require that the pressure drop on the four multiclones for the two boilers will be monitored and recorded.

Condition 42: 6 NYCRR 228-1.3(b)(1) Coating records shall be kept.

Condition 43: 6 NYCRR 228-1.3(d) The coating booths and coating areas shall be inspected for these housekeeping practices.

Condition 44: 40 CFR 64.7 The Zurn multiclones shall be inspected quarterly per the CAM Plan.

Condition 45: 40 CFR Part 64 A CAM Plan is required.

Condition 51: 6 NYCRR 211.2 A complaint response plan shall be utilized.