



Facility Identification Data

Name: GARLOCK SEALING TECHNOLOGIES
Address: 1666 DIVISION ST
PALMYRA, NY 14522

Owner/Firm

Name: GARLOCK INC
Address: 1666 DIVISION ST
PALMYRA, NY 14522, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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AVON, NY 14414-9519
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Division of Air Resources:
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Air Permitting Contact:
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1666 DIVISION ST
PALMYRA, NY 14522
Phone:3155973101

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

Application for renewal of Air Title V Facility.

Attainment Status

GARLOCK SEALING TECHNOLOGIES is located in the town of PALMYRA in the county of WAYNE. 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 < 10 μ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO ₂)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NO _x)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NO_x) which are ozone precursors.

** NO_x has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

GARLOCK OPERATES A MANUFACTURING FACILITY IN PALMYRA, NEW YORK. THE FACILITY MANUFACTURES AND TESTS VARIOUS TYPES OF MECHANICAL PACKINGS INCLUDING VARIOUS GASKETS, EXPANSION JOINTS, AND MOLDED SPECIALTY PRODUCTS. THE OPERATIONS AT THE FACILITY INCLUDE MIX ING RUBBER/PLASTIC DRY COMPONENTS WITH SOLVENTS, CURING, GRINDING, CALENDERING, COATING, PAINTING, TESTING, AND ROUTINE MAINTENANCE ACTIVITIES. POWER (STEAM AND HEAT) IS SUPPLIED TO THE FACILITY BY TWO NATURAL GAS FIRED BOILERS. BULK QUANTITIES OF MINERAL SPIRITS AND TOLUENE, AS WELL AS PETROLEUM PRODUCTS ARE STORED IN ABOVE GROUND TANKS AT THE FACILITY.

Permit Structure and Description of Operations

The Title V permit for GARLOCK SEALING TECHNOLOGIES

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.

GARLOCK SEALING TECHNOLOGIES is defined by the following emission unit(s):

Emission unit 1BOILR - Two boilers (83.1 MM Btu/hr and 110.8 MM Btu/hr) firing natural gas or No. 2 fuel oil to provide process steam.

Emission unit 1BOILR is associated with the following emission points (EP):
10001, 10003

It is further defined by the following process(es):

Process: GAS is located at 1, Building 1 - Natural gas firing of one 83.1 MM Btu/hr boiler and one 110.8 MM Btu/hr boiler to supply process steam to facility. Steam distribution system allows only one boiler to be operating at a given time.

Emission unit 1EXPJT - Expansion joint department. Fabrication of expansion joint forms and product including form assembly, sheet, cord and adhesive wrapping to assemble product, and oven curing of product.

Emission unit 1EXPJT is associated with the following emission points (EP):
2403O, 2405O, 2406O

It is further defined by the following process(es):

Process: OV2 is located at 1, Building 24 - Some expansion joints and/or expansion joint materials are cured in ovens prior to final assembly/shipment

Emission unit 1GYLON - Gylon dough making and forming, and oven drying to remove solvents.

Emission unit 1GYLON is associated with the following emission points (EP):

1601O, 1602O, 1603O, 1605O, 1606O, 1611M, 1612M, 1616M, 1617O, 1620P, 1621V

It is further defined by the following process(es):

Process: SLV is located at 1, Building 16 - Gylon raw materials including powders, pigments, clays and stoddard solvent are mixed together into a dough. The dough is then placed in calendaring machines which roll the dough into sheets. The sheets are then dried in ovens.

Emission unit 1HPSHT - High pressure sheeting operations including dough mixing and production of rubber sheeting. Ongoing conversion of operations to more automated equipment and procedures.

Emission unit 1HPSHT is associated with the following emission points (EP):

0503R, 0504R, 0505R, 1101R, 1102R, 1103R, 1104R, 1105R

It is further defined by the following process(es):

Process: SHT is located at 1,2, BASEMENT, Building 11 - Rubber dough is spread onto high pressure sheeting machines which press the dough into rubber sheets. Solvents are removed and recovered in one of six recovery units located in buildings 5 and 11.

Emission unit 1MLDRB - Rubber molding operations including steam heated presses to form products.

Emission unit 1MLDRB is associated with the following emission points (EP):

1211G, 2003P, 2006P, 2023S

It is further defined by the following process(es):

Process: GR5 is located at 1, Building 20 - Grinders are used to remove rough edges from parts before and after being pressed.

Process: SC3 is located at 1, Building 20 - Spray coating metal rings with a bonding adhesive agent prior to being joined with metal parts in the presses.

Emission unit 1RBRMX - Pigment mixing for use in other manufacturing departments.

Emission unit 1RBRMX is associated with the following emission points (EP):

1503M



It is further defined by the following process(es):

Process: BRM is located at 1,2, & 3, Building 15 - Mixing of pigments for use in other departments.

Emission unit 1SPRUB - Specialty rubber manufacturing operations including heated extrusion, pressing, vulcanizing, grinding, trimming, drying and curing.

Emission unit 1SPRUB is associated with the following emission points (EP):

2501O, 2503O, 2515C, 2516B, 2516O, 2517O, 2518O

It is further defined by the following process(es):

Process: GR4 is located at 1, Building 25 - Grinders and trimmers are used to trim rubber parts from extruded tube rubber.

Process: OV1 is located at 1, Building 25 - Ovens are used for drying and curing of isoprene, silicone, and hypalon rubber parts.

Emission unit 1TANKS - Horizontal, above ground VOC solvent storage tanks.

Emission unit 1TANKS is associated with the following emission points (EP):

TF003, TF005, TF006

It is further defined by the following process(es):

Process: TOL is located at 0, Building TF - Two ASTs are used to store virgin and reclaimed toluene.

Emission unit 2KLZRS - Coating metal springs or rings with adhesive before they are sent to rubber assembly.

Emission unit 2KLZRS is associated with the following emission points (EP):

0201S, 1801S

It is further defined by the following process(es):

Process: SC2 is located at 1, Building 201 - Spring material is coated with a compliant adhesive before going to the press room where the rubber surface material is applied.

Title V/Major Source Status

GARLOCK SEALING TECHNOLOGIES is subject to Title V requirements. This determination is based on the following information:

This facility is a major source of volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions.

Program Applicability

The following chart summarizes the applicability of GARLOCK SEALING TECHNOLOGIES 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)	NO
NSPS	NO
TITLE IV	NO



TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

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

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

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

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

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

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

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

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality



standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

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

SIC Code	Description
2822	SYNTHETIC RUBBER
3053	GASKETS, PACKING AND SEALING DEVICES

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
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
4-07-036-01	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - FIXED ROOF TANKS - AROMATICS Benzene: Breathing Loss
3-08-006-99	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - OTHER FABRICATED PLASTICS
4-02-007-01	Other Not Classified SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Adhesive Application

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series 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



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

Cas No.	Contaminant Name	PTE		Range	
		lbs/yr			
000092-52-4	1, 1 BIPHENYL	pteyear		Y	
000079-34-5	1,1,2,2-TETRACHLOROETHANE		pteyear		Y
000120-82-1	1,2,4-TRICHLOROBENZENE	pteyear		Y	
000084-74-2	1,2-BENZENEDICARBOXYLIC ACID, DIBUTYL ESTER		pteyear		Y
000107-06-2	1,2-DICHLOROETHANE	pteyear		Y	
006423-43-4	1,2-PROPANEDIOL, DINITRATE		pteyear		A
000108-38-3	1,3 DIMETHYL BENZENE	pteyear		Y	
000106-99-0	1,3-BUTADIENE	pteyear		Y	
000126-99-8	1,3-BUTADIENE, 2-CHLORO-	pteyear		Y	
000123-91-1	1,4-DIETHYLENE DIOXIDE	pteyear		Y	
000098-86-2	1-PHENYLETHANONE	pteyear		Y	
000121-14-2	2,4, DINITRO TOLUENE	pteyear		Y	
000051-28-5	2,4, DINITROPHENOL	pteyear		Y	
000088-06-2	2,4,6 TRICHLOROPHENOL	pteyear		Y	
000078-59-1	2-CYCLOHEXEN-1-ONE,3,5,5-TRIMETHYL		pteyear		Y
000095-48-7	2-METHYL-PHENOL	pteyear		Y	
000108-10-1	2-PENTANONE, 4-METHYL	pteyear		Y	
000107-05-1	3-CHLORO-1-PROPENE	pteyear		Y	
000092-93-3	4-NITROBIPHENYL	pteyear		Y	
000075-07-0	ACETALDEHYDE	pteyear		Y	
000108-05-4	ACETIC ACID ETHENYL ESTER		pteyear		Y
000075-05-8	ACETONITRILE	pteyear		Y	
000107-02-8	ACROLEIN	pteyear		Y	
000062-53-3	ANILINE	pteyear		Y	
007440-38-2	ARSENIC	pteyear		Y	
000090-04-0	BENZENAMINE, 2-METHOXY	pteyear		Y	
000095-53-4	BENZENAMINE, 2-METHYL	pteyear		Y	
000121-69-7	BENZENAMINE, N, N-DIMETHYL		pteyear		Y
000071-43-2	BENZENE	pteyear		Y	
000098-82-8	BENZENE, (1-METHYLETHYL)	pteyear		Y	
000106-46-7	BENZENE, 1,4-DICHLORO-	pteyear		Y	
000095-47-6	BENZENE,1,2-DIMETHYL	pteyear		Y	
000092-87-5	BENZIDINE	pteyear		Y	
000100-44-7	BENZYL CHLORIDE	pteyear		Y	
000117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE		pteyear		Y
000075-25-2	BROMOFORM	pteyear		Y	
007440-43-9	CADMIUM	pteyear		Y	
000075-15-0	CARBON DISULFIDE	pteyear		Y	
000630-08-0	CARBON MONOXIDE	pteyear		C	
000056-23-5	CARBON TETRACHLORIDE	pteyear		Y	
000463-58-1	CARBONYL SULFIDE	pteyear		Y	
000108-90-7	CHLOROBENZENE	pteyear		Y	
000067-66-3	CHLOROFORM	pteyear		Y	
007440-47-3	CHROMIUM	pteyear		Y	
000132-64-9	DIBENZOFURAN	pteyear		Y	
000075-09-2	DICHLOROMETHANE	pteyear		Y	
000131-11-3	DIMETHYL PHTHALATE	pteyear		Y	
000071-55-6	ETHANE, 1,1,1-TRICHLORO	pteyear		Y	
000079-00-5	ETHANE, 1,1,2-TRICHLORO	pteyear		Y	



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000075-34-3	ETHANE, 1,1-DICHLORO-	pteyear		Y	
000106-93-4	ETHANE, 1,2-DIBROMO	pteyear		Y	
000075-00-3	ETHANE, CHLORO	pteyear		Y	
000067-72-1	ETHANE, HEXACHLORO	pteyear		Y	
000075-35-4	ETHENE, 1,1-DICHLORO	pteyear		Y	
000100-41-4	ETHYLBENZENE	pteyear		Y	
000050-00-0	FORMALDEHYDE	pteyear		Y	
0NY100-00-0	HAP	pteyear		H	
000087-68-3	HEXACHLOROBUTADIENE	pteyear		Y	
000110-54-3	HEXANE	pteyear		Y	
007647-01-0	HYDROGEN CHLORIDE	pteyear		Y	
007664-39-3	HYDROGEN FLUORIDE	pteyear		Y	
007439-92-1	LEAD	pteyear		Y	
000062-75-9	METHANAMINE, N-METHYL-N-NITROSO	pteyear	pteyear		Y
000074-83-9	METHYL BROMIDE	pteyear		Y	
000074-87-3	METHYL CHLORIDE	pteyear		Y	
000078-93-3	METHYL ETHYL KETONE	pteyear		Z	
001634-04-4	METHYL TERTBUTYL ETHER		pteyear		Y
000091-20-3	NAPHTHALENE	pteyear		Y	
000059-89-2	NITROSOMORPHOLINE	pteyear		Y	
0NY210-00-0	OXIDES OF NITROGEN	pteyear		F	
000106-89-8	OXIRANE, (CHLOROMETHYL)	pteyear		Y	
000092-67-1	P-AMINODIPHENYL	pteyear		Y	
000100-02-7	PARA-NITROPHENOL	pteyear		Y	
0NY075-00-0	PARTICULATES	pteyear		C	
000082-68-8	PENTACHLORONITROBENZENE		pteyear		Y
000540-84-1	PENTANE, 2,2,4-TRIMETHYL-	pteyear		Y	
000565-75-3	PENTANE, 2,3,4 TRIMETHYL	pteyear		A	
000127-18-4	PERCHLOROETHYLENE	pteyear		Y	
000108-95-2	PHENOL	pteyear		Y	
000087-86-5	PHENOL, PENTACHLORO	pteyear		Y	
000088-85-7	PHENOL,2-(1-METHYLPROPYL)-4,6-DINITRO-(C10H12N2O5)	pteyear			A
0NY075-00-5	PM-10	pteyear		C	
001336-36-3	POLYCHLORINATED BIPHENYL		pteyear		Y
000096-12-8	PROPANE, 1,2-DIBROMO-3-CHLORO		pteyear		Y
000075-56-9	PROPANE, 1,2-EPOXY-	pteyear		Y	
000107-13-1	PROPENENITRILE	pteyear		Y	
000106-51-4	QUINONE	pteyear		Y	
008052-41-3	STODDARD SOLVENT	pteyear		G	
000100-42-5	STYRENE	pteyear		Y	
007446-09-5	SULFUR DIOXIDE	pteyear		G	
000108-88-3	TOLUENE	pteyear		Z	
000079-01-6	TRICHLOROETHYLENE	pteyear		Y	
000095-95-4	TRICHLOROPHENOL, 2,4,5	pteyear		Y	
001582-09-8	TRIFLURALIN	pteyear		Y	
000075-01-4	VINYL CHLORIDE	pteyear		Y	
0NY998-00-0	VOC	pteyear		H	
000106-42-3	XYLENE, PARA-	pteyear		Y	

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NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

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



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

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.



Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

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

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		62	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	
FACILITY	6NYCRR 201-1.4	63	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 27, 28	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	15	
FACILITY	6NYCRR 201-6.5 (a) (7)	2	
FACILITY	6NYCRR 201-6.5 (a) (8)	16	
FACILITY	6NYCRR 201-6.5 (c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3)	24	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for



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04/14/2008

				Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (d) (5)	17		
FACILITY	6NYCRR 201-6.5 (e)	6		
FACILITY	6NYCRR 201-6.5 (f)	25		
FACILITY	6NYCRR 201-6.5 (f) (6)	18		
FACILITY	6NYCRR 201-6.5 (g)	26		
FACILITY	6NYCRR 201-7	29		Federally Enforceable Emissions Caps
1-BOILR	6NYCRR 201-7	30, 31		Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	19		
FACILITY	6NYCRR 202-2.1	7		Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8		Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	64		General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20		General Prohibitions - visible emissions limited
1-EXPJT/-/OV2	6NYCRR 212.4 (a)	33		General Process Emission Sources - emissions from new sources and/or modifications
1-SPRUB/-/OV1	6NYCRR 212.4 (a)	49		General Process Emission Sources - emissions from new sources and/or modifications
1-HPSHT	6NYCRR 212.4 (b)	39		
1-EXPJT/-/OV2	6NYCRR 212.4 (c)	34		General Process Emission Sources - emissions from new processes and/or modifications
1-GYLON	6NYCRR 212.4 (c)	36		General Process Emission Sources - emissions from new processes and/or modifications
1-GYLON/-/SLV/SECBS	6NYCRR 212.4 (c)	38		General Process Emission Sources - emissions from new processes and/or modifications
1-HPSHT	6NYCRR 212.4 (c)	40		General Process Emission Sources - emissions from new processes and/or modifications
1-MLDRB/-/GR5	6NYCRR 212.4 (c)	42		General Process Emission Sources - emissions from new processes and/or modifications
1-RBRMX	6NYCRR 212.4 (c)	44		General Process Emission Sources - emissions from new processes and/or modifications
1-RBRMX/-/BRM/BHDC3	6NYCRR 212.4 (c)	46		General Process Emission Sources - emissions from new processes and/or modifications
1-SPRUB	6NYCRR 212.4 (c)	47		General Process Emission Sources - emissions from new processes and/or modifications
2-KLZRS/-/SC2	6NYCRR 212.4 (c)	54		General Process Emission Sources - emissions from new processes and/or modifications
1-EXPJT/-/OV2	6NYCRR 212.6 (a)	35		General Process Emission Sources - opacity of emissions limited
1-GYLON	6NYCRR 212.6 (a)	37		General Process Emission



1-HPSHT	6NYCRR 212.6(a)	41	Sources - opacity of emissions limited
1-MLDRB/-/GR5	6NYCRR 212.6(a)	43	General Process Emission Sources - opacity of emissions limited
1-RBRMX	6NYCRR 212.6(a)	45	General Process Emission Sources - opacity of emissions limited
1-SPRUB	6NYCRR 212.6(a)	48	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215	9	
1-BOILR	6NYCRR 227-1.3(a)	32	Smoke Emission Limitations.
2-KLZRS/-/SC2	6NYCRR 228.3(a)	55	Recordkeeping, reports for VOCs
2-KLZRS/-/SC2	6NYCRR 228.4	56	
2-KLZRS/-/SC2	6NYCRR 228.5(a)	57	VOC recordkeeping by the facility
2-KLZRS/-/SC2	6NYCRR 228.5(b)	58	
2-KLZRS/-/SC2	6NYCRR 228.5(c)	59	Alternate sampling and analysis methods
2-KLZRS/-/SC2	6NYCRR 228.5(d)	60	Department Access to Obtain Samples
2-KLZRS/-/SC2	6NYCRR 228.7	61	
1-TANKS/TF003	6NYCRR 229.3(e)(2)(iv)	51	Volatile organic liquid storage tanks
1-TANKS/TF005	6NYCRR 229.3(e)(2)(iv)	52	Volatile organic liquid storage tanks
1-TANKS/TF006	6NYCRR 229.3(e)(2)(iv)	53	Volatile organic liquid storage tanks
1-TANKS	6NYCRR 229.3(e)(2)(v)	50	Volatile organic liquid storage tanks
1-BOILR	6NYCRR 231-2.6	30, 31	Emission reduction credits

Applicability Discussion:

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

ECL 19-301.

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

6NYCRR Part 200-6

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

6NYCRR Part 200-7

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

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results



from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-6

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

6NYCRR 201-6.5(a)(4)

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

6NYCRR 201-6.5(a)(7)



This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

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

6NYCRR Part 201-6.5(c)(2)

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

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

This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

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

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the



permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

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

6NYCRR Part 211-2

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

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers,



appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, GARLOCK SEALING TECHNOLOGIES has been determined to be subject to the following regulations:

6NYCRR 201-6.5 (f)

This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6NYCRR 201-7

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

6NYCRR 212 .4 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6NYCRR 212 .4 (b)

212.4(b) establishes a limit on gas and liquid particulates.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

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

6NYCRR 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.

6NYCRR 228 .3 (a)

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

6NYCRR 228 .4

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

6NYCRR 228 .5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as



applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228 , to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6NYCRR 228 .5 (b)

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

6NYCRR 228 .5 (c)

This citation allows alternate sampling and analysis methods to be used, subject to the approval of the Department and the Administrator.

6NYCRR 228 .5 (d)

This citation allows representatives of the Department to obtain coating samples during reasonable business hours, for the purpose of determining compliance.

6NYCRR 228 .7

Table 1 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6NYCRR 229 .3 (e) (2) (iv)

This section requires a tank with submerged fill for storage of volatile organic liquids

6NYCRR 229 .3 (e) (2) (v)

This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6NYCRR 231-2.6

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

The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6.

Compliance Certification

Summary of monitoring activities at GARLOCK SEALING TECHNOLOGIES:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	24	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance



FACILITY	25	procedures record keeping/maintenance procedures
1-BOILR	30	intermittent emission testing
1-BOILR	31	work practice involving specific operations
FACILITY	7	record keeping/maintenance procedures
1-HPSHT	39	continuous emission monitoring (cem)
1-EXPJT/-/OV2	34	intermittent emission testing
1-GYLON	36	intermittent emission testing
1-GYLON/-/SLV/SECBS	38	record keeping/maintenance procedures
1-HPSHT	40	intermittent emission testing
1-MLDRB/-/GR5	42	intermittent emission testing
1-RBRMX	44	intermittent emission testing
1-RBRMX/-/BRM/BHDC3	46	record keeping/maintenance procedures
1-SPRUB	47	intermittent emission testing
2-KLZRS/-/SC2	54	record keeping/maintenance procedures
1-EXPJT/-/OV2	35	intermittent emission testing
1-GYLON	37	intermittent emission testing
1-HPSHT	41	intermittent emission testing
1-MLDRB/-/GR5	43	intermittent emission testing
1-RBRMX	45	intermittent emission testing
1-SPRUB	48	intermittent emission testing
1-BOILR	32	monitoring of process or control device parameters as surrogate
2-KLZRS/-/SC2	56	monitoring of process or control device parameters as surrogate
2-KLZRS/-/SC2	57	record keeping/maintenance procedures
2-KLZRS/-/SC2	59	record keeping/maintenance procedures
2-KLZRS/-/SC2	61	work practice involving specific operations
1-TANKS	50	record keeping/maintenance procedures

Basis for Monitoring

Condition 5 requires reporting of compliance monitoring every six based on the requirements of 6 NYCRR Part 201-6.5(c)(3)(ii) and 40 CFR 70.6(a)(3)(iii).

Condition 6 requires annual reporting of compliance status of each individual permit condition based on the requirements of 6 NYCRR Part 201-6.5(e) and 40 CFR 70.6(c)(5).

Condition 7 requires the submission of a statement of actual emissions based on the requirements of 6 NYCRR Part 202-2.1 and 40 CFR 70.9(a) and (b)(2).

Condition 25 provides for an operational flexibility plan which allows the permittee to make minor operational changes without having to formally modify the permit in compliance with 6 NYCRR Part 201-6.5(f) and 40 CFR 70.4(b)(12).

Condition 30 establishes an emission rate limit for oxides of nitrogen from the process steam boilers. This was established as part of a cap on emissions used to generate emission reduction credits (ERCs). The requirements are based on 6 NYCRR Part 201-7 and Part 231-2.6.

Condition 31 sets an annual tonnage cap on oxides of nitrogen emissions from the process steam boilers. This was established as part of a cap on emissions used to generate emission reduction credits (ERCs). The requirements are based on 6 NYCRR Part 201-7 and Part 231-2.6.



Condition 32 limits the opacity emissions from the process steam boilers as per 6 NYCRR Part 227-1.3(a).

Conditions 34, 36, 40, 42, 44 and 47 limit particulate emissions from manufacturing process sources as required by 6 NYCRR Part 212.4(c).

Conditions 35, 37, 41, 43, 45 and 48 limit opacity emissions from manufacturing processes as required by 6 NYCRR Part 212.6(a).

Condition 38 requires monthly inspections and record keeping for maintenance of manufacturing process particulate emission control equipment to comply with 6 NYCRR Part 212.4(c).

Condition 39 requires monitoring of volatile organic compound (VOC) concentration at the output of the VOC emission control equipment to monitor compliance with 6 NYCRR Part 212.4(b).

Condition 50 requires monitoring of the operation of conservation vents on large VOC storage tanks to certify compliance with 6 NYCRR Part 229.3(e)(2)(v).

Condition 56 sets opacity emission limits for surface coating operations as required by 6 NYCRR Part 228.4.

Condition 57 requires record keeping to demonstrate compliance with VOC Reasonably Available Control Technology (RACT) for surface coatings as specified in 6 NYCRR 228.5(a).

Condition 59 allows for alternatives to the standard sampling and test methods to demonstrate compliance with VOC RACT for surface coatings as specified in 6 NYCRR Part 228.5(c).

Condition 61 sets limit for VOC content of specific surface coating type as required in 6 NYCRR Part 228.7.