



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 4-0126-00160/00144  
Mod 0 Effective Date: 05/19/2006 Expiration Date: No expiration date.  
Mod 1 Effective Date: 06/30/2011 Expiration Date: No expiration date.

Permit Issued To: SAINT-GOBAIN ABRASIVES INC  
1 NEW BOND RD  
PO BOX 15008  
WORCESTER, MA 01606-2614

Facility: SAINT-GOBAIN ABRASIVES INC  
2600 TENTH AVE  
WATERVLIET, NY 12189

Contact: PAUL RAPPLEYEA  
SAINT-GOBAIN ABRASIVES INC  
2600 TENTH AVE  
WATERVLIET, NY 12189

Description:

Modification to include upgraded efficiencies of the production line of 17-Maker. Upgrade includes replacement of existing natural gas-fired heat soak ovens with newer, more efficient ovens which will allow for an increase in line speed. Modifications to 14-Maker and 17-Maker will include removal of dampers such that all emissions during processing will pass through the oxidizer. No changes to the facility's emission caps will occur as a result of these modifications.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: MICHAEL T HIGGINS  
DIVISION OF ENVIRONMENTAL PERMITS  
1130 N WESTCOTT RD  
SCHENECTADY, NY 12306-2014

Authorized Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ /



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**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

**Item B: Permittee's Contractors to Comply with Permit**

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

**Item C: Permittee Responsible for Obtaining Other Required Permits**

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

**Item D: No Right to Trespass or Interfere with Riparian Rights**

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
  - Applications for permit renewals, modifications and transfers
  - Applications for Permit Renewals and Modifications
  - Permit modifications, suspensions or revocations by the Department
  - Permit Modifications, Suspensions and Revocations by the Department

**Facility Level**

- Submission of Applications for Permit Modification or Renewal
  - REGION 4 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 4 HEADQUARTERS



**DEC GENERAL CONDITIONS**  
**\*\*\*\* General Provisions \*\*\*\***  
**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

**Item 1.2:**

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

**Item 1.3:**

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**

**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

**Condition 1-1: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 1-1.1:**

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

**Item 1-1.2:**

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

**Item 1-1.3:**

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.



**Condition 3: Applications for Permit Renewals and Modifications**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 3.1:**

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

**Item 3.2:**

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

**Item 3.3:**

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 1-2: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 1-2.1:**

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**Condition 4: Permit Modifications, Suspensions and Revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.14**

**Item 4.1:**

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of



the Department related to the permitted activity.

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 4 HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.5 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 4 Headquarters  
Division of Environmental Permits  
1150 North Westcott Rd.  
Schenectady, NY 12306-2014  
(518) 357-2069

**Condition 1-3: Submission of application for permit modification or renewal-REGION 4**

**HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 1-3.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 4 Headquarters  
Division of Environmental Permits  
1130 North Westcott Rd.  
Schenectady, NY 12306-2014  
(518) 357-2069

**New York State Department of Environmental Conservation**

Permit ID: 4-0126-00160/00144

Facility DEC ID: 4012600160



**Permit Under the Environmental Conservation Law (ECL)**

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY  
PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: SAINT-GOBAIN ABRASIVES INC  
1 NEW BOND RD  
PO BOX 15008  
WORCESTER, MA 01606-2614

Facility: SAINT-GOBAIN ABRASIVES INC  
2600 TENTH AVE  
WATERVLIET, NY 12189

Authorized Activity By Standard Industrial Classification Code:  
2261 - FINISHING PLANTS, COTTON  
2262 - FINISHING PLANTS, SYNTHETICS  
3291 - ABRASIVE PRODUCTS

Mod 0 Permit Effective Date: 05/19/2006  
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 06/30/2011  
date.

Permit Expiration Date: No expiration





## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 202-1.1: Required Emissions Tests
- 1-1 6 NYCRR 202-1.1: Required Emissions Tests
- 2 6 NYCRR 201-7.2: Facility Permissible Emissions
- \*3 6 NYCRR 201-7.2: Capping Monitoring Condition
- \*4 6 NYCRR 201-7.2: Capping Monitoring Condition
- \*5 6 NYCRR 201-7.2: Capping Monitoring Condition
- \*6 6 NYCRR 201-7.2: Capping Monitoring Condition
- \*7 6 NYCRR 201-7.2: Capping Monitoring Condition
- 8 6 NYCRR 202-1.1: Compliance Demonstration
- 9 6 NYCRR 202-1.1: Compliance Demonstration
- 10 6 NYCRR 202-1.1: Compliance Demonstration
- 11 6 NYCRR 202-1.2: Notification
- 12 6 NYCRR 202-1.3: Acceptable procedures - Stack test report submittal
- 1-2 6 NYCRR 211.1: Air pollution prohibited
- 1-3 6 NYCRR 212.11 (b) (1): Compliance Demonstration
- 13 6 NYCRR 225-1.8: Compliance Demonstration
- 14 6 NYCRR 228-1.1 (a): Permit Requirements
- 15 6 NYCRR 228-1.1 (d): Will remain subject
- 16 6 NYCRR 228-1.3: Compliance Demonstration
- 17 6 NYCRR 228-1.4: Compliance Demonstration
- 18 6 NYCRR 228-1.5 (a): Compliance Demonstration
- 19 6 NYCRR 228-1.5 (b): Use of Methods 311 or 24.
- 20 6 NYCRR 228-1.5 (j): Compliance Demonstration
- 21 6 NYCRR 228-1.5 (k): Compliance Demonstration
- 22 6 NYCRR 228-1.10: Handling, storage and disposal of VOCs
- 25 6 NYCRR 234.1 (g): Facilities subject to Part 234 remain subject  
even if emissions go below applicability threshold
- 26 6 NYCRR 234.3 (a): Compliance Demonstration
- 23 6 NYCRR 234.4 (b) (2): Compliance Demonstration
- 27 6 NYCRR 234.4 (b) (3): Compliance Demonstration
- 24 6 NYCRR 234.4 (b) (4): Compliance Demonstration
- 28 6 NYCRR 234.6: Handling, storage, and disposal of volatile organic  
compounds
- 29 40CFR 63.829(d), Subpart KK: Compliance Demonstration

#### Emission Unit Level

#### EU=B-OILER

- 30 6 NYCRR 227-1.3 (a): Compliance Demonstration
- 31 40CFR 60.4, NSPS Subpart A: EPA Region 2 address.
- 32 40CFR 60.7(a), NSPS Subpart A: Modification Notification
- 33 40CFR 60.7(b), NSPS Subpart A: Recordkeeping requirements.
- 34 40CFR 60.7(f), NSPS Subpart A: Facility files for subject sources.
- 35 40CFR 60.9, NSPS Subpart A: Availability of information.
- 36 40CFR 60.11(d), NSPS Subpart A: Compliance with Standards and  
Maintenance Requirements
- 37 40CFR 60.12, NSPS Subpart A: Circumvention.



- 38 40CFR 60.14, NSPS Subpart A: Modifications.
- 39 40CFR 60.15, NSPS Subpart A: Reconstruction.
- 40 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration
- 41 40CFR 60.48c(i), NSPS Subpart Dc: Duration of records maintained.

**EU=B-OILER,Proc=FO2**

- 42 6 NYCRR 227-1.3: Compliance Demonstration
- 43 40 CFR Part 50: Compliance Demonstration
- 44 40CFR 60.42c(i), NSPS Subpart Dc: Enforceability.
- 45 40CFR 60.44c(h), NSPS Subpart Dc: Alternative compliance methods for sulfur dioxide.
- 46 40CFR 60.46c(e), NSPS Subpart Dc: Exemption from sulfur dioxide monitoring requirements.
- 47 40CFR 60.48c(d), NSPS Subpart Dc: Compliance Demonstration
- 48 40CFR 60.48c(e)(1), NSPS Subpart Dc: Compliance Demonstration
- 49 40CFR 60.48c(e)(11), NSPS Subpart Dc: Compliance Demonstration
- 50 40CFR 60.48c(f)(1), NSPS Subpart Dc: Compliance Demonstration

**EU=C-AR001**

- 51 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

**EU=C-AR001,EP=32260,Proc=PCR**

- 52 6 NYCRR 212.4 (c): Compliance Demonstration

**EU=U-FTNKS**

- 53 6 NYCRR 212.4 (a): Emissions from new emission sources and/or modifications

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 54 ECL 19-0301: Contaminant List
- 1-4 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 55 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 56 6 NYCRR Subpart 201-5: Emission Unit Definition
- 1-5 6 NYCRR 211.2: Visible Emissions Limited
- 58 6 NYCRR 211.2: Compliance Demonstration
- 60 6 NYCRR 211.2: Compliance Demonstration
- 62 6 NYCRR 212.4 (a): Compliance Demonstration
- 63 6 NYCRR 221.2: Asbestos containing surface coatings prohibited

**Emission Unit Level**

- 64 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 65 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.



**FEDERALLY ENFORCEABLE CONDITIONS**  
**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Sealing - 6 NYCRR 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

**Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6**

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Item C: Maintenance of Equipment - 6 NYCRR 200.7**

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,



required to operate such device effectively.

**Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2**

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

**Item E: Emergency Defense - 6 NYCRR 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 F: Recycling and Salvage - 6 NYCRR 201-1.7**

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

**Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8**

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

**Item H: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)**

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

**Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)**

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

**Item J: Required Emission Tests - 6 NYCRR 202-1.1**



An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

**Item K: Visible Emissions Limited - 6 NYCRR 211.3**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Item L: Open Fires Prohibitions - 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.

**Item M: 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 N: 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.

**FEDERAL APPLICABLE REQUIREMENTS**  
The following conditions are federally enforceable.

**Condition 1: Required Emissions Tests**  
Effective between the dates of 05/19/2006 and Permit Expiration Date

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 1.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

**Condition 1-1: Required Emissions Tests**  
Effective between the dates of 06/30/2011 and Permit Expiration Date

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 1-1.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

**Condition 2: Facility Permissible Emissions**  
Effective between the dates of 05/19/2006 and Permit Expiration Date

**Applicable Federal Requirement:6 NYCRR 201-7.2**

**Item 2.1:**

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following  
Potential To Emit (PTE) rate for each regulated contaminant:

per year	CAS No: 000050-00-0 (From Mod 1)	PTE: 19,000 pounds
	Name: FORMALDEHYDE	
per year	CAS No: 000067-56-1 (From Mod 1)	PTE: 19,000 pounds
	Name: METHYL ALCOHOL	
	CAS No: 000079-10-7 (From Mod 1)	PTE: 19,000 pounds

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Facility DEC ID: 4012600160



per year	Name: 2-PROPENOIC ACID		
	CAS No: 000100-42-5 (From Mod 1)	PTE:	19,000 pounds
per year	Name: STYRENE		
	CAS No: 000107-13-1 (From Mod 1)	PTE:	19,000 pounds
per year	Name: PROPENENITRILE		
	CAS No: 000108-10-1 (From Mod 1)	PTE:	19,000 pounds
per year	Name: 2-PENTANONE, 4-METHYL		
	CAS No: 000108-95-2 (From Mod 1)	PTE:	19,000 pounds
per year	Name: PHENOL		
	CAS No: 000111-76-2 (From Mod 1)	PTE:	19,000 pounds
per year	Name: ETHANOL, 2-BUTOXY-		
	CAS No: 000121-44-8 (From Mod 1)	PTE:	19,000 pounds
per year	Name: N,N-DIETHYL ETHANAMINE		
	CAS No: 000630-08-0 (From Mod 1)	PTE:	190,000 pounds
per year	Name: CARBON MONOXIDE		
	CAS No: 007446-09-5 (From Mod 1)	PTE:	190,000 pounds
per year	Name: SULFUR DIOXIDE		
	CAS No: 0NY075-00-5 (From Mod 1)	PTE:	190,000 pounds
per year	Name: PM-10		
	CAS No: 0NY100-00-0 (From Mod 1)	PTE:	47,500 pounds
per year	Name: HAP		
	CAS No: 0NY210-00-0 (From Mod 1)	PTE:	190,000 pounds
per year	Name: OXIDES OF NITROGEN		
	CAS No: 0NY998-00-0 (From Mod 1)	PTE:	95,000 pounds
per year	Name: VOC		

**Condition 3: Capping Monitoring Condition**





Effective between the dates of 05/19/2006 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.2

**Item 3.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

- 6 NYCRR Subpart 201-6
- 40 CFR Part 63, Subpart DDDDD
- 40 CFR Part 63, Subpart JJJJ
- 40 CFR Part 63, Subpart OOOO

**Item 3.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 3.3:**

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.

**Item 3.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 3.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 3.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

- |                     |                        |
|---------------------|------------------------|
| CAS No: 000050-00-0 | FORMALDEHYDE           |
| CAS No: 000067-56-1 | METHYL ALCOHOL         |
| CAS No: 000100-42-5 | STYRENE                |
| CAS No: 000107-13-1 | PROPENENITRILE         |
| CAS No: 000108-10-1 | 2-PENTANONE, 4-METHYL  |
| CAS No: 000108-95-2 | PHENOL                 |
| CAS No: 000111-76-2 | ETHANOL, 2-BUTOXY-     |
| CAS No: 000121-44-8 | N,N-DIETHYL ETHANAMINE |
| CAS No: 000079-10-7 | 2-PROPENOIC ACID       |



**Item 3.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The emissions of each individual HAP (Hazardous Air Pollutant) shall be limited to less than 9.5 tons per year (less than the major source threshold). Emissions from all sources, including those that are not subject to permitting requirements, but excluding emissions from trivial activities identified in 6 NYCRR 201-3.3(c), will be incorporated into the total.

Emissions will be calculated using a combination of emission factors and material usage records. Records shall be maintained in accordance with 201-7.2(d).

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

**Condition 4: Capping Monitoring Condition**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 201-7.2**

**Item 4.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6  
40 CFR Part 63, Subpart DDDDD  
40 CFR Part 63, Subpart JJJJ  
40 CFR Part 63, Subpart OOOO

**Item 4.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 4.3:**

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.





purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 231-2

**Item 5.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 5.3:**

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.

**Item 5.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 5.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 5.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 5.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To avoid triggering Non Attainment New Source Review, VOC annual emissions from the seven emission units that are affected by the project (1-4MKR1, 1-7MK19, 2-3MAKR, A-LINE1, F-LINE1, C-AR001, B-OILER) are capped at 56 ton/yr. This number represents: past actual= 18 ton/yr + 95% of 40 ton/yr or SSPT= 38 ton/yr= 56 ton/yr. SSPT=Significant Source Project Threshold.

The facility maintains spreadsheets that are used to calculate emissions based on coating usage and formulation



VOC content.

The 201-6 cap of 47.5 ton/yr in this permit overrides this 56 ton/yr cap.

Monitoring Frequency: MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2007.  
Subsequent reports are due every 12 calendar month(s).

**Condition 6: Capping Monitoring Condition**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 201-7.2**

**Item 6.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

**Item 6.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 6.3:**

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.

**Item 6.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 6.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 6.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 4-0126-00160/00144

Facility DEC ID: 4012600160



CAS No: 0NY998-00-0 VOC

**Item 6.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The emissions of VOC (Volatile Organic Compounds) shall be limited to less than 47.5 tons per year (less than the major source threshold). Emissions from all sources, including those that are not subject to permitting requirements, but excluding emissions from trivial activities identified in 6 NYCRR 201-3.3(c), will be incorporated into the total.

Emissions will be calculated using a combination of emission factors and material usage records. Records shall be maintained in accordance with 201-7.2(d).

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

**Condition 7: Capping Monitoring Condition**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 201-7.2**

**Item 7.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

**Item 7.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 7.3:**

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.

**Item 7.4:**

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On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 7.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 7.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000630-08-0	CARBON MONOXIDE
CAS No: 007446-09-5	SULFUR DIOXIDE
CAS No: 0NY210-00-0	OXIDES OF NITROGEN
CAS No: 0NY075-00-5	PM-10

**Item 7.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The emissions of each of the listed contaminants shall be limited to less than 95 tons per year (less than the major source threshold). Emissions from all sources, including those that are not subject to permitting requirements, but excluding emissions from trivial activities identified in 6 NYCRR 201-3.3(c), will be incorporated into the total.

Emissions will be calculated using a combination of emission factors and material usage records. Records shall be maintained in accordance with 201-7.2(d).

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2007.

Subsequent reports are due every 12 calendar month(s).

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 8.1:**

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The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: 1-4MKR1

Emission Unit: 1-7MK19

Emission Unit: A-LINE1

Emission Unit: F-LINE1

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The thermal oxidizer shall be stack tested every 10 years to confirm emission factors which are used to determine if annual emissions are less than the 95 ton/yr cap. Since the last test was May 11, 2004, the next test shall be done by May 11, 2014. Coordination shall be made with NYSDEC to witness the test.

Upper Permit Limit: 95 tons per year

Reference Test Method: 40 CFR 60 A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 9.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: 1-4MKR1

Emission Unit: 1-7MK19

Emission Unit: A-LINE1

Emission Unit: F-LINE1

Regulated Contaminant(s):



New York State Department of Environmental Conservation

Permit ID: 4-0126-00160/00144

Facility DEC ID: 4012600160



CAS No: 000108-95-2 PHENOL  
CAS No: 000050-00-0 FORMALDEHYDE

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The thermal oxidizer shall be stack tested every 10 years to confirm emission factors which are used to determine if annual emissions of each of the listed contaminants is less than the 9.5 ton/yr cap. Since the last test was May 11, 2004, the next test shall be done by May 11, 2014. Coordination shall be made with NYSDEC to witness the test.

Upper Permit Limit: 9.5 tons per year

Reference Test Method: 40 CFR 60 A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 10.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: 1-4MKR1

Emission Unit: 1-7MK19

Emission Unit: A-LINE1

Emission Unit: F-LINE1

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The thermal oxidizer shall be stack tested every 10 years to confirm emission factors which are used to determine if annual emissions are less than the 47.5 ton/yr cap. Since



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**Item 1-3.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: 1-4MKR1

Emission Unit: 1-7MK19

Emission Unit: A-LINE1

Emission Unit: F-LINE1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

CAS No: 0NY998-00-0 VOC

**Item 1-3.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Center bed temperature of the thermal oxidizer (emission  
source: 00272; emission point: 31272) limited.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1600 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 13: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 225-1.8**

**Item 13.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility which purchases and  
fires coal and/or fuel oil shall compile and retain  
records of the following information:

a. fuel analyses and data on the quantities of all  
residual and distillate oil and coal received, burned or  
sold;

b. the names of all purchasers of all residual and  
distillate oil and coal sold;



c. any results of stack sampling, stack monitoring and other procedures used to ensure compliance with the provisions of 6 NYCRR Part 225-1.

Fuel analyses must contain, as a minimum, data on the sulfur content, specific gravity and heating value of any residual oil, distillate oil or coal received, burned or sold. Ash content shall also be included in the fuel analyses for any residual oil or coal received, burned or sold.

These records shall be retained for a minimum period of three years. If the facility is subject to Title V requirements the minimum record retention period shall be five years. The records shall be made available for inspection by department staff during normal business hours. In addition, copies of such records shall be furnished to department staff upon request. All required sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 14: Permit Requirements**

**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.1 (a)**

**Item 14.1:**

Every owner or operator of a facility applying for a Title V facility permit or State facility permit, including modifications, must:

- (1) identify the method(s) (e.g., sampling, testing, etc.), if any, that will be used to comply with the requirements of this Part;
- (2) where applicable, provide a process specific reasonably available control technology (RACT) determination under subdivision 228.3(e) unless the RACT demonstration has already been approved by the Department and the Administrator and a reevaluation frequency for the RACT determination is included in the facility's existing Title V facility permit or State facility permit; and
- (3) where applicable, submit evidence to demonstrate that the shut down of a natural gas fired VOC incinerator pursuant to subdivision 228.3(b) will not jeopardize air quality.

**Condition 15: Will remain subject**

**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.1 (d)**

**Item 15.1:**

Any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228 will remain subject to these provisions even if the annual potential to emit VOCs for the facility later falls

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below the thresholds set forth in 228.1(b).

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.3**

**Item 16.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: 0-9MKR1

Emission Unit: 1-4MKR1

Emission Unit: 1-7MK19

Emission Unit: 2-3MAKR

Emission Unit: A-LINE1

Emission Unit: F-LINE1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

Each coating formulation VOC content, minus water and excluded VOC, at application limited. MSDSs may be used to determine compliance. So long as the formulation is unchanged, VOC content can be determined when the formulation is first introduced for its initial use.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 17: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.4**



**Item 17.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: 0-9MKR1

Emission Unit: 1-4MKR1

Emission Unit: 1-7MK19

Emission Unit: 2-3MAKR

Emission Unit: A-LINE1

Emission Unit: F-LINE1

**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee shall conduct an observation of visible emissions from the facility at the monitoring frequency stated below. The permittee shall investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard. The permittee shall make any necessary corrections, and verify that the excess visible emissions problem has been corrected.

If visible emissions with the potential to exceed the standard continue, the permittee shall conduct a Method 9 observation within the next 48 hours of the sources associated with the potential noncompliance to determine the degree of opacity and shall notify the NYSDEC if the Method 9 observation indicates that the opacity standard is not met.

Records of visible emissions observations, investigations, corrective actions and any Method 9 observations shall be kept for 5 years.

Parameter Monitored: OPACITY

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Upper Permit Limit: 20 percent  
Monitoring Frequency: DAILY  
Averaging Method: 6 MINUTE AVERAGE  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 18: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.5 (a)**

**Item 18.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 18.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the Department and, upon request, these records must be submitted to the Department. Any facility required to perform the overall removal efficiency calculation, must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance must be provided to the Department in a format acceptable to the Department.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 19: Use of Methods 311 or 24.**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.5 (b)**

**Item 19.1:**

Upon request by the Department, the owner and operator of any emission source subject to 6NYCRR Part 228, must use Method 311 or Method 24 as presented in Appendices A of both

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40 CFR Parts 63 and 60, respectively (see table 1, section 200.9 of Title 6), 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 as applied coating during a compliance demonstration.

**Condition 20: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.5 (j)**

**Item 20.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 20.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 6NYCRR Part 228 must be reported to the Department within 30 days following notice or generation of the information or record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 21: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.5 (k)**

**Item 21.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 21.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required by 6NYCRR Part 228 must be maintained at the facility for five years.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY





**Condition 22: Handling, storage and disposal of VOCs**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 228-1.10**

**Item 22.1:**

Within the work area(s) associated with a coating line, the owner or operator of this facility must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents.
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:
  - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
  - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
  - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
  - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

**Condition 25: Facilities subject to Part 234 remain subject even if emissions go below applicability threshold**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.1 (g)**

**Item 25.1:**

Any printing process that is subject to the provisions of 6NYCRR Part 234 will remain subject to these provisions even if the emissions of volatile organic compounds from the facility later fall below the applicability criteria.



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Emission Unit: 1-7MK19

Process: P19

Emission Source: 19FLX

Emission Unit: 2-3MAKR

Process: 231

Emission Source: PXM23

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 23.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings and printing inks are presented in Appendix A, methods 24 and 24A respectively, of 40 CFR 60. Alternate analytical methods for surface coating and printing ink analysis must be approved by the commissioner and the USEPA. Instead of an ink/solvent/volatile analysis, the commissioner may accept certification from the ink manufacturer of the composition of the ink solvent/volatiles, if supported by actual batch records.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 27: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.4 (b) (3)**

**Item 27.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-4MKR1

Process: P14

Emission Source: 14FLX

Emission Unit: 1-7MK19

Process: P17

Emission Source: 17FLX

Emission Unit: 1-7MK19

Process: P19

Emission Source: 19FLX

Emission Unit: 2-3MAKR

Process: 231

Emission Source: PXM23

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Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 27.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, usage and/or production records of inks, VOC and solvents must be maintained in a format acceptable to the commissioner's representative, and upon request, these records must be submitted to the Department's representative. In addition, any other information required to determine compliance with 6NYCRR Part 234 must be provided to the Commissioner's representative in a format acceptable to him or her. Records must be maintained at the facility for a period of five years.

The facility shall maintain the following records for each ink, cleaning solvent, and other VOC used in the printing process, on a monthly basis:

1. The brand and product name or code for the material.
2. The quantity of material used during the calendar month.
3. The VOC content of the material.

In addition, copies of all purchase orders, invoices, and other documents for supplies and equipment that are used to support the monthly log are to be kept on site.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 24: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6 NYCRR 234.4 (b) (4)**

**Item 24.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: 1-4MKR1  
Process: P14 Emission Source: 14FLX

Emission Unit: 1-7MK19  
Process: P17 Emission Source: 17FLX

Emission Unit: 1-7MK19

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Process: P19

Emission Source: 19FLX

Emission Unit: 2-3MAKR

Process: 231

Emission Source: PXM23

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 24.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The results of any analysis or other procedure used for establishing compliance must be provided to the commissioner's representative. Representatives of the department shall be permitted, during reasonable business hours, to obtain ink and/or fountain solution samples for the purpose of determining compliance with 6NYCRR Part 234.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 28: Handling, storage, and disposal of volatile organic compounds**

**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 234.6**

**Item 28.1:**

No owner or operator of a facility subject to 6NYCRR Part 234 shall:

- (a) use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup or ink/coating removal;
- (b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;
- (c) use open containers to store or dispose of inks and/or surface coatings; or
- (d) use open containers to store or dispense inks and/or surface coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

**Condition 29: Compliance Demonstration**

**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 63.829(d), Subpart KK**



**Item 29.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: 1-4MKR1  
Process: P14 Emission Source: 14FLX

Emission Unit: 1-7MK19  
Process: P17 Emission Source: 17FLX

Emission Unit: 1-7MK19  
Process: P19 Emission Source: 19FLX

Emission Unit: 2-3MAKR  
Process: 231 Emission Source: PXM23

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 HAP

**Item 29.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each facility which commits to the criteria of 40CFR63.820(a)(2) for the purpose of capping his or her facility out of 40CFR63 Subpart KK shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria.

These records shall be kept on a monthly basis, and shall include the mass of all HAP-containing materials used during the month, and the mass fraction of HAP present in each HAP-containing material used.

Monitoring Frequency: MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

\*\*\*\* Emission Unit Level \*\*\*\*

**Condition 30: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)**

**Item 30.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-OILER



Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 30.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a combustion installation shall operate the installation in such a way to emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test Method 9 in Appendix A of 40 CFR 60. Compliance testing shall be conducted at the discretion of the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 31: EPA Region 2 address.  
Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.4, NSPS Subpart A**

**Item 31.1:**

This Condition applies to Emission Unit: B-OILER

**Item 31.2:**

All requests, reports, applications, submittals, and other communications to the Administrator pursuant to this part shall be submitted in duplicate to the following address:

Director, Division of Enforcement and Compliance Assistance  
USEPA Region 2  
290 Broadway, 21st Floor  
New York, NY 10007-1886

Copies of all correspondence to the administrator pursuant to this part shall also be submitted to the NYSDEC Regional Office issuing this permit (see address at the beginning of this permit) and to the following address:

NYSDEC  
Bureau of Quality Assurance  
625 Broadway



Albany, NY 12233-3258

**Condition 32: Modification Notification**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.7(a), NSPS Subpart A**

**Item 32.1:**

This Condition applies to Emission Unit: B-OILER

**Item 32.2:**

Any owner or operator subject to 40 CFR Part 60 shall furnish the Administrator and this office with the following information:

- a notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless the change is specifically exempted under 40 CFR Part 60. The notice shall be post marked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productivity capability of the facility before and after the change, and the expected completion date of the change. The Administrator and/or this Department may request additional information regarding the change.

**Condition 33: Recordkeeping requirements.**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.7(b), NSPS Subpart A**

**Item 33.1:**

This Condition applies to Emission Unit: B-OILER

**Item 33.2:**

Affected owners or operators shall maintain records of occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

**Condition 34: Facility files for subject sources.**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.7(f), NSPS Subpart A**

**Item 34.1:**

This Condition applies to Emission Unit: B-OILER

**Item 34.2:**

The following files shall be maintained at the facility for all affected sources: all measurements, including continuous monitoring systems, monitoring device, and



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performance testing measurements; all continuous monitoring system evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part, recorded in permanent form suitable for inspection. The file shall be maintained for at least two years following the date of such measurements, reports, and records.

**Condition 35: Availability of information.**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.9, NSPS Subpart A**

**Item 35.1:**

This Condition applies to Emission Unit: B-OILER

**Item 35.2:**

The availability to the public of information provided to, or otherwise obtained by, the Administrator under this part shall be governed by part 2 of this chapter.

**Condition 36: Compliance with Standards and Maintenance Requirements**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.11(d), NSPS Subpart A**

**Item 36.1:**

This Condition applies to Emission Unit: B-OILER

**Item 36.2:**

At all times, including periods of startup, shutdown, and malfunction, owners and operators of this facility shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department and the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source

**Condition 37: Circumvention.**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.12, NSPS Subpart A**

**Item 37.1:**

This Condition applies to Emission Unit: B-OILER

**Item 37.2:**

No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.



**Condition 38: Modifications.**  
Effective between the dates of 05/19/2006 and Permit Expiration Date

**Applicable Federal Requirement:40CFR 60.14, NSPS Subpart A**

**Item 38.1:**

This Condition applies to Emission Unit: B-OILER

**Item 38.2:**

Within 180 days of the completion of any physical or operational change (as defined in section 60.14), compliance with the applicable standards must be achieved.

**Condition 39: Reconstruction.**  
Effective between the dates of 05/19/2006 and Permit Expiration Date

**Applicable Federal Requirement:40CFR 60.15, NSPS Subpart A**

**Item 39.1:**

This Condition applies to Emission Unit: B-OILER

**Item 39.2:**

The following shall be submitted to the Administrator prior to reconstruction (as defined in section 60.15):

- 1) a notice of intent to reconstruct 60 days prior to the action;
- 2) name and address of the owner or operator;
- 3) the location of the existing facility;
- 4) a brief description of the existing facility and the components to be replaced;
- 5) a description of the existing air pollution control equipment and the proposed air pollution control equipment;
- 6) an estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new facility;
- 7) the estimated life of the facility after the replacements; and
- 8) a discussion of any economic or technical limitations the facility may have in complying with the applicable standards of performance after the proposed replacements.

**Condition 40: Compliance Demonstration**  
Effective between the dates of 05/19/2006 and Permit Expiration Date

**Applicable Federal Requirement:40CFR 60.48c(g), NSPS Subpart Dc**

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**Item 40.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-OILER

**Item 40.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 41: Duration of records maintained.  
Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.48c(i), NSPS Subpart Dc**

**Item 41.1:**

This Condition applies to Emission Unit: B-OILER

**Item 41.2:**

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

**Condition 42: Compliance Demonstration  
Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 227-1.3**

**Item 42.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-OILER

Process: FO2

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 42.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The permittee shall conduct observations of visible emissions from the emission unit, process, etc. to which



this condition applies at the monitoring frequency stated below while the process is in operation.

The permittee shall investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard. The permittee shall make any necessary corrections, and verify that the excess visible emissions problem has been corrected.

If visible emissions with the potential to exceed the standard continue, the permittee shall conduct a Method 9 observation within the next 48 hours of the sources associated with the potential noncompliance to determine the degree of opacity and shall notify the NYSDEC if the Method 9 observation indicates that the opacity standard is not met.

Records of visible emissions observations, investigations, corrective actions and any followup Method 9 observations shall be kept for 5 years.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: DAILY

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 43: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40 CFR Part 50**

**Item 43.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-OILER

Process: FO2

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 43.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Sulfur content of distillate fuel oil capped to insure compliance with the NAAQS for SO<sub>2</sub>. This limit was determined through dispersion modeling. Fuel Supplier Certification (FSC) shall be used to demonstrate compliance.

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As required by 40 CFR 60.48(c), semi-annual reports shall be submitted to the Administrator.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: NUMBER 2 OIL  
Parameter Monitored: SULFUR CONTENT  
Upper Permit Limit: 0.25 percent by weight  
Monitoring Frequency: PER DELIVERY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2006.  
Subsequent reports are due every 6 calendar month(s).

**Condition 44: Enforceability.**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.42c(i), NSPS Subpart Dc**

**Item 44.1:**

This Condition applies to Emission Unit: B-OILER  
Process: FO2

**Item 44.2:**

The sulfur dioxide emission limits, percentage reductions, and fuel oil sulfur limitations shall apply at all times, including periods of startup, shutdown, and malfunction.

**Condition 45: Alternative compliance methods for sulfur dioxide.**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.44c(h), NSPS Subpart Dc**

**Item 45.1:**

This Condition applies to Emission Unit: B-OILER  
Process: FO2

**Item 45.2:**

Facilities demonstrating compliance through vendor certification shall follow the compliance procedures listed in paragraphs 40 CFR 60-Dc.48c(f)(1), (2), or (3), as applicable.

**Condition 46: Exemption from sulfur dioxide monitoring requirements.**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**



**Applicable Federal Requirement:40CFR 60.46c(e), NSPS Subpart Dc**

**Item 46.1:**

This Condition applies to Emission Unit: B-OILER  
Process: FO2

**Item 46.2:**

Facilities subject to paragraphs 40 CFR 60-Dc.42c(h)(1), (2), or (3) showing compliance through vendor certification shall be exempt from section 40 CFR 60-Dc.46c.

**Condition 47: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.48c(d), NSPS Subpart Dc**

**Item 47.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-OILER  
Process: FO2

Regulated Contaminant(s):  
CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 47.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected facility subject to the SO2 emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall submit semi-annual reports to the Administrator.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

**Condition 48: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.48c(e)(1), NSPS Subpart Dc**

**Item 48.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-OILER  
Process: FO2

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Regulated Contaminant(s):  
CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 48.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected facility subject to the SO<sub>2</sub> emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records as required under §60.48c(d) including the following information.

Calendar dates covered in the reporting period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

**Condition 49: Compliance Demonstration**

**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.48c(e)(11), NSPS Subpart Dc**

**Item 49.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-OILER

Process: FO2

Regulated Contaminant(s):  
CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 49.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected facility subject to the SO<sub>2</sub> emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records as required under §60.48c(d) including the following information.

If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph §60.48c(f)(1)(2) or (3). In addition to records of fuel supplier certification, the

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semi-annual report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

**Condition 50: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.48c(f)(1), NSPS Subpart Dc**

**Item 50.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-OILER

Process: FO2

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 50.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Fuel supplier certification shall include the following information for distillate oil:

- i) The name of the oil supplier, and
- ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c. 60-Dc 41c defines distillate oil as fuel that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, A standard Specification for Fuel Oils.

Monitoring Frequency: PER DELIVERY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

Subsequent reports are due every 6 calendar month(s).

**Condition 51: Emissions from new emission sources and/or modifications**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**





**Applicable Federal Requirement:6 NYCRR 212.4 (a)**

**Item 51.1:**

This Condition applies to Emission Unit: C-AR001

**Item 51.2:**

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

**Condition 52: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 52.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: C-AR001 Emission Point: 32260  
Process: PCR

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 52.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 53: Emissions from new emission sources and/or modifications**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR 212.4 (a)**

**Item 53.1:**



This Condition applies to Emission Unit: U-FTNKS

**Item 53.2:**

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.



**STATE ONLY ENFORCEABLE CONDITIONS**  
**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

**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.

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.

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**



**Condition 54: Contaminant List**

**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable State Requirement:ECL 19-0301**

**Item 54.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000050-00-0

Name: FORMALDEHYDE

CAS No: 000067-56-1

Name: METHYL ALCOHOL

CAS No: 000079-10-7

Name: 2-PROPENOIC ACID

CAS No: 000100-42-5

Name: STYRENE

CAS No: 000107-13-1

Name: PROPENENITRILE

CAS No: 000108-10-1

Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-95-2

Name: PHENOL

CAS No: 000111-76-2

Name: ETHANOL, 2-BUTOXY-

CAS No: 000121-44-8

Name: N,N-DIETHYL ETHANAMINE

CAS No: 000630-08-0

Name: CARBON MONOXIDE

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY075-00-5

Name: PM-10

CAS No: 0NY100-00-0

Name: HAP



CAS No: 0NY210-00-0  
Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0  
Name: VOC

**Condition 1-4: Unavoidable noncompliance and violations**  
**Effective between the dates of 06/30/2011 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 1-4.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of



any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 55: Unavoidable noncompliance and violations**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable State Requirement: 6 NYCRR 201-1.4**

**Item 55.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which

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result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 56: Emission Unit Definition**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 56.1(From Mod 1):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-4MKR1

Emission Unit Description:

The emission unit is comprised of one Process (P14) that involves a coating line. The coating line, 14-Maker, contains a coating head (Emission Source (ES) 14CTR), a supertherm heated curing oven, and a small flexographic printer (ES 14FLX).

The coating hood (EP 30295), 14-Maker oven zone 1 (EP 30031), 14 maker oven zone 2 (EP 30030), 14 maker oven zone 3 (EP 30032), 14-Maker oven zone 4 (EP 30029) are directed to the common thermal oxidizer (ES 00272).

2 emission points are vented directly to atmosphere; they are 14-Maker suction drums (EP 30296, EP 30297). The flexographic printer vents directly to atmosphere as fugitive emissions.

Building(s): BLDG 30  
BLDG 31

**Item 56.2(From Mod 1):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 1-7MK19

Emission Unit Description:

The Emission Unit is comprised of two Processes (P17 and P19) that involve two coating lines. The first coating line, 17-Maker line, is a one pass operation that contains a flexographic printer (Emission Source (ES) 17FLX), a "make" surface coater (ES 17MAK), a gas fired intermediate oven, a "size" surface coater (ES 17SIZ), and a supertherm heated final oven.



The second coating line, 19 Maker, is a two pass operation that contains a surface coater (ES 19CTR) that is able to perform "make" or "size" operations, a gas fired oven, and a flexographic printer (ES 19FLX).

Emissions from capture hoods and selected oven zones are directed to the common thermal oxidizer (ES 00272). The only emission points from the emission unit that are vented directly to atmosphere are the 17 Maker suction drums (EPs 30289, 31197 and 31193), The ABB Thermal Oxidizer (EP 31272), 17-Maker heat soak ovens (EPs 31262, 31314), 19-Maker Oven Cooling Zone (EP 31014), the Grieve Ovens (EPs 31307, 31308, 31309, 31310, 31311, 31312).

Building(s): BLDG 30  
BLDG 31

**Item 56.3(From Mod 1):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 2-3MAKR

Emission Unit Description:

The emission unit is comprised of 2 processes that involve a coating line (231, 232) and 1 process that involves coating mixing (233)

The coating line, 23 maker, is a multi-pass operation that contains a flexographic printer (emission source (es) PXM 23), surface coater (ES A2913), an electrostatic unit for grain application, an uv lamp system, and a three-section gas fired oven (ES OVN23).

Particulate emissions are directed to a dust collector (ES CT006) and then are exhausted to atmosphere through a stack (EP 32301). Emissions from the oven are exhausted to atmosphere through EP 32300; emissions also occur through 3 room exhausts (EP32302, 32303 and 32304) and Maker 23 coater hood (EP 32305).

Building(s): BLDG 32

**Item 56.4(From Mod 1):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: A-LINE1

Emission Unit Description:

This emission unit is comprised of one process (POA) that involves a cloth finishing line.

The cloth finishing line, A-Line (Emission Source (ES) ALCTR), is used to prepare cloth substrate prior to the manufacture of coated abrasive material.

The coater hood (EP 32291) and oven exhaust (EP 32293) are



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directed to the common thermal oxidizer (ES 00272) for resin coatings; for non-resin coatings, they vent directly to atmosphere.

The singer (EP 32290) and dye bath (EP 32292) always vent directly to atmosphere.

Building(s): BLDG 32

**Item 56.5(From Mod 1):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: F-LINE1

Emission Unit Description:

THE EMISSION UNIT IS COMPRISED OF ONE PROCESS (POF) THAT INVOLVES A CLOTH FINISHING LINE.

THE CLOTH FINISHING LINE, F LINE, CONTAINS A COATING HEAD (EMISSION SOURCE (ES) FLCTR), AND A SUPERTHERM HEATED CURING OVEN.

ALL OF THE EMISSION POINTS FROM THE EMISSION UNIT ARE DIRECTED TO THE COMMON THERMAL OXIDIZER (ES 00272) FOR RESIN COATINGS. FOR NON-RESIN COATINGS, ALL EMISSION POINTS VENT DIRECTLY TO ATMOSPHERE.

THE EMISSION POINTS FOR THIS EMISSION UNIT INCLUDE F LINE COATER HOOD (EP 32294), F LINE OVEN ZONE 1 (EP 32104), F LINE OVEN ZONE 2 (EP 32105), F LINE OVEN ZONE 3 (EP 32106), F LINE OVEN ZONE 4 (EP 32107), F LINE OVEN ZONE 5 (EP 32109).

Building(s): BLDG 32

**Item 56.6(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-9MKR1

Emission Unit Description:

THE EMISSION UNIT IS COMPRISED OF ONE PROCESS (P09) THAT INVOLVES A COATING LINE.

THE COATING LINE, 9 MAKER, IS A PILOT MAKER THAT CONTAINS A COATING HEAD (EMISSION SOURCE (ES) 09CTR), AND A SUPERTHERM HEATED CURING OVEN.

EMISSIONS FROM THE MIX AREA ARE DIRECTED TO A DUST COLLECTOR (ES 00267) AND THEN



EXHAUSTED TO ATMOSPHERE THROUGH A STACK (EP 28267).

EMISSIONS FROM THE COATING TROUGH, GRAIN ROOM, AND UV LAMP ARE DIRECTED TO A CARBON ADSORPTION BED (ES 00206) AND ARE THEN EXHAUSTED TO ATMOSPHERE THROUGH A STACK (EP 28206). HOWEVER, NON UV COATINGS; THAT IS, LOW VOC COATINGS, ARE VENTED DIRECTLY TO ATMOSPHERE.

THE REMAINING EMISSION POINTS FROM THE EMISSION UNIT ARE VENTED DIRECTLY TO ATMOSPHERE; THEY INCLUDE 9 MAKER OVEN SECTION A (EP 28207) AND 9 MAKER OVEN SECTION B (EP 28208).

Building(s): BLDG 28

**Item 56.7(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: B-OILER

Emission Unit Description:

THIS EMISSION UNIT IS COMPRISED OF BOILERS FIRING EITHER NATURAL GAS (PROCESS NG1) OR #2 FUEL OIL (PROCESS FO2).

THE TWO IDENTICAL PACKAGE BOILERS (EMISSION SOURCES (ES) BOIL1 AND BOIL2 SUPPLY PROCESS HEAT AND COMFORT HEAT FOR PARTS OF THE FACILITY.

THE EMISSION POINTS FROM THIS EMISSION UNIT ARE VENTED DIRECTLY TO ATMOSPHERE (EP 18001, 18002).

Building(s): BLDG 18

**Item 56.8(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: C-AR001

Emission Unit Description:

THE EMISSION UNIT IS COMPRISED OF ONE PROCESS (PCR) THAT INVOLVES A MIXING STATION.

THE MIXING STATION, KNOWN AS THE CENTRAL ADHESIVE ROOM, CONTAINS A MIX PLATFORM (EMISSION SOURCE (ES) MXSTN).

EMISSION FROM THE MIX PLATFORM ARE DIRECTED TO A DUST COLLECTOR (ES 00260) AND THEN ARE EXHAUSTED TO ATMOSPHERE THROUGH A STACK (EP

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32260).

Building(s): BLDG 32

**Item 56.9(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-FTNKS

Emission Unit Description:

THE EMISSION UNIT IS COMPRISED OF RESIN STORAGE TANKS (PROCESS PUF).

EACH OF THE THREE IDENTICAL TANKS (EMISSION SOURCES (ES) TANK1, TANK2, AND TANK3) ARE KEPT IN A COOLED ROOM AT APPROXIMATELY 60 F.

DURING THE DELIVERY OF RESIN TO THE TANKS, ORGANIC VAPOR FROM THE TANKS IS DIRECTED TO A CARBON ADSORPTION BED (ES 00263) THEN IS EXHAUSTED TO ATMOSPHERE THROUGH A STACK (EP 32263).

Building(s): BLDG 32

**Condition 1-5: Visible Emissions Limited**  
**Effective between the dates of 06/30/2011 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 1-5.1:**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Condition 58: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 58.1:**

The Compliance Demonstration activity will be performed for the facility:  
The Compliance Demonstration applies to:

Emission Unit: A-LINE1

Emission Unit: F-LINE1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

CAS No: 0NY998-00-0 VOC



**Item 58.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A-Line and F-Line coatings are classified into two categories: resin or non-resin. The resin coatings contain HAP and VOC; their exhaust is controlled at the common thermal oxidizer. The nonresin coatings do not require control; their exhaust is uncontrolled.

For A-Line, the coater hood (EP 32291) and oven (EP 32293) are directed to the common thermal oxidizer (Emission Source (ES) 00272) (TO) for resin coatings; for non-resin coatings, they vent directly to atmosphere.

For F-Line, all of the emission points (EPs 32104, 32105, 32106, 32107, 32109 and 32294) are directed to the common thermal oxidizer (TO) for resin coatings; for nonresin coatings, all emission points vent directly to atmosphere.

The operator sets the stack damper positions as each production run is set up. Limit switches located on each stack indicate that the dampers have reached the correct position. A signal is transmitted from the damper verifying that the dampers are in the correct position.

A record of damper positions and coatings used shall be maintained. To ensure that the system performs correctly, a quarterly maintenance inspection program shall be implemented.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 60: Compliance Demonstration**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 60.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-9MKR1  
Process: P09

Emission Point: 28206  
Emission Source: 00206

Emission Unit: U-FTNKS  
Process: PUF

Emission Point: 32263  
Emission Source: 00263

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Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

CAS No: 0NY998-00-0 VOC

**Item 60.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The carbon will be replaced at a regular predetermined interval. This interval shall be annually.

However, this interval may be changed to a interval that is equal to a greater length of time as determined by a design analysis. The design analysis shall address the total working capacity of the control device and emission point operating schedule. (Although not applicable, you may use 40 CFR 63 DD 693 (d)(4)(iii) for guidance.)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 62: Compliance Demonstration**

**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR 212.4 (a)**

**Item 62.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-9MKR1

Emission Unit: 1-4MKR1

Emission Unit: 1-7MK19

Emission Unit: 2-3MAKR

Emission Unit: A-LINE1

Emission Unit: F-LINE1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 62.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

For contaminants given an A-rating, no person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from table 2, table 3, or Table 4 of 6 NYCRR Part 212.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 63: Asbestos containing surface coatings prohibited Effective between the dates of 05/19/2006 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 221.2

Item 63.1:

No person shall engage in or allow surface coating by the spraying of asbestos or asbestos-containing materials.

\*\*\*\* Emission Unit Level \*\*\*\*

Condition 64: Emission Point Definition By Emission Unit Effective between the dates of 05/19/2006 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 64.1(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-7MK19

Emission Point: 30018 Height (ft.): 41 Diameter (in.): 20 NYTMN (km.): 4732.5 NYTME (km.): 605.6 Building: BLDG 30

Emission Point: 30023 Height (ft.): 41 Diameter (in.): 20 NYTMN (km.): 4732.5 NYTME (km.): 605.6 Building: BLDG 30

Emission Point: 30025 Height (ft.): 41 Diameter (in.): 26 NYTMN (km.): 4732.5 NYTME (km.): 605.6 Building: BLDG 30

Emission Point: 30028 Height (ft.): 41 Diameter (in.): 26 NYTMN (km.): 4732.5 NYTME (km.): 605.6 Building: BLDG 30

Emission Point: 30289 Height (ft.): 46 Diameter (in.): 13 NYTMN (km.): 4732.3 NYTME (km.): 605.6 Building: BLDG 30

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Emission Point: 30313			
Height (ft.): 41	Diameter (in.): 18		
NYTMN (km.): 4732.5	NYTME (km.): 605.6	Building: BLDG 30	
Emission Point: 30320			
Height (ft.): 41	Diameter (in.): 22		
NYTMN (km.): 4732.5	NYTME (km.): 605.6	Building: BLDG 30	
Emission Point: 31011			
Height (ft.): 41	Diameter (in.): 22		
NYTMN (km.): 4732.5	NYTME (km.): 605.6	Building: BLDG 31	
Emission Point: 31012			
Height (ft.): 41	Diameter (in.): 18		
NYTMN (km.): 4732.5	NYTME (km.): 605.6	Building: BLDG 31	
Emission Point: 31013			
Height (ft.): 41	Diameter (in.): 28		
NYTMN (km.): 4732.5	NYTME (km.): 605.6	Building: BLDG 31	
Emission Point: 31020			
Height (ft.): 41	Diameter (in.): 32		
NYTMN (km.): 4732.5	NYTME (km.): 605.6	Building: BLDG 31	
Emission Point: 31251			
Height (ft.): 41	Diameter (in.): 18		
NYTMN (km.): 4732.5	NYTME (km.): 605.6	Building: BLDG 31	
Emission Point: 31314			
Height (ft.): 41	Diameter (in.): 10		
NYTMN (km.): 4732.5	NYTME (km.): 605.6	Building: BLDG 31	

**Item 64.2(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-9MKR1			
Emission Point: 28206			
Height (ft.): 26	Diameter (in.): 10		
NYTMN (km.): 4732.524	NYTME (km.): 605.633	Building: BLDG 28	
Emission Point: 28207			
Height (ft.): 31	Diameter (in.): 30		
NYTMN (km.): 4732.524	NYTME (km.): 605.633	Building: BLDG 28	
Emission Point: 28208			
Height (ft.): 24	Diameter (in.): 16		
NYTMN (km.): 4732.524	NYTME (km.): 605.633	Building: BLDG 28	
Emission Point: 28267			
Height (ft.): 31	Diameter (in.): 16		
NYTMN (km.): 4732.524	NYTME (km.): 605.633		



**Item 64.3(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit:	1-4MKR1		
Emission Point:	30029		
Height (ft.):	40	Diameter (in.):	13
NYTMN (km.):	4732.3	NYTME (km.):	605.6
		Building:	BLDG 30
Emission Point:	30030		
Height (ft.):	40	Diameter (in.):	16
NYTMN (km.):	4732.3	NYTME (km.):	605.6
		Building:	BLDG 30
Emission Point:	30031		
Height (ft.):	40	Diameter (in.):	20
NYTMN (km.):	4732.3	NYTME (km.):	605.6
		Building:	BLDG 30
Emission Point:	30032		
Height (ft.):	40	Diameter (in.):	13
NYTMN (km.):	4732.3	NYTME (km.):	605.6
		Building:	BLDG 30
Emission Point:	30295		
Height (ft.):	40	Diameter (in.):	26
NYTMN (km.):	4732.3	NYTME (km.):	605.6
		Building:	BLDG 30
Emission Point:	30296		
Height (ft.):	40	Diameter (in.):	18
NYTMN (km.):	4732.3	NYTME (km.):	605.6
		Building:	BLDG 30
Emission Point:	30297		
Height (ft.):	40	Diameter (in.):	16
NYTMN (km.):	4732.3	NYTME (km.):	605.6
		Building:	BLDG 30

**Item 64.4(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit:	1-7MK19		
Emission Point:	30017		
Height (ft.):	41	Diameter (in.):	20
NYTMN (km.):	4732.3	NYTME (km.):	605.6
		Building:	BLDG 30
Emission Point:	30024		
Height (ft.):	41	Diameter (in.):	26
NYTMN (km.):	4732.524	NYTME (km.):	605.633
		Building:	BLDG 30
Emission Point:	30026		
Height (ft.):	41	Diameter (in.):	20
NYTMN (km.):	4732.3	NYTME (km.):	605.6
		Building:	BLDG 30
Emission Point:	30027		



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Height (ft.): 41 NYTMN (km.): 4732.3	Diameter (in.): 20 NYTME (km.): 605.6	Building: BLDG 30
Emission Point: 31014 Height (ft.): 37 NYTMN (km.): 4732.3	Diameter (in.): 27 NYTME (km.): 605.6	Building: BLDG 31
Emission Point: 31016 Height (ft.): 41 NYTMN (km.): 4732.524	Diameter (in.): 24 NYTME (km.): 605.633	Building: BLDG 31
Emission Point: 31022 Height (ft.): 41 NYTMN (km.): 4732.524	Diameter (in.): 20 NYTME (km.): 605.633	Building: BLDG 31
Emission Point: 31193 Height (ft.): 34 NYTMN (km.): 4732.3	Diameter (in.): 7 NYTME (km.): 605.6	Building: BLDG 31
Emission Point: 31197 Height (ft.): 28 NYTMN (km.): 4732.3	Diameter (in.): 11 NYTME (km.): 605.6	Building: BLDG 31
Emission Point: 31262 Height (ft.): 41 NYTMN (km.): 4732.3	Diameter (in.): 6 NYTME (km.): 605.6	Building: BLDG 31
Emission Point: 31272 Height (ft.): 60 NYTMN (km.): 4732.3	Diameter (in.): 72 NYTME (km.): 605.6	Building: BLDG 31
Emission Point: 31307 Height (ft.): 41 NYTMN (km.): 4732.3	Diameter (in.): 10 NYTME (km.): 605.6	Building: BLDG 31
Emission Point: 31308 Height (ft.): 41 NYTMN (km.): 4732.3	Diameter (in.): 10 NYTME (km.): 605.6	Building: BLDG 31
Emission Point: 31309 Height (ft.): 41 NYTMN (km.): 4732.3	Diameter (in.): 10 NYTME (km.): 605.6	Building: BLDG 31
Emission Point: 31310 Height (ft.): 41 NYTMN (km.): 4732.3	Diameter (in.): 10 NYTME (km.): 605.6	Building: BLDG 31
Emission Point: 31311 Height (ft.): 41 NYTMN (km.): 4732.3	Diameter (in.): 10 NYTME (km.): 605.6	Building: BLDG 31
Emission Point: 31312		

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Height (ft.): 41                      Diameter (in.): 10  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 31

**Item 64.5(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 2-3MAKR

Emission Point: 32300  
Height (ft.): 46                      Diameter (in.): 18  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 32

Emission Point: 32301  
Height (ft.): 41                      Diameter (in.): 28  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 32

Emission Point: 32302  
Height (ft.): 36                      Diameter (in.): 18  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 32

Emission Point: 32303  
Height (ft.): 36                      Diameter (in.): 18  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 32

Emission Point: 32304  
Height (ft.): 36                      Diameter (in.): 18  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 32

Emission Point: 32305  
Height (ft.): 31                      Diameter (in.): 4  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 32

**Item 64.6(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: A-LINE1

Emission Point: 32290  
Height (ft.): 41                      Diameter (in.): 18  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 32

Emission Point: 32291  
Height (ft.): 41                      Diameter (in.): 40  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 32

Emission Point: 32292  
Height (ft.): 41                      Diameter (in.): 16  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 32

Emission Point: 32293  
Height (ft.): 41                      Diameter (in.): 24  
NYTMN (km.): 4732.3              NYTME (km.): 605.6              Building: BLDG 32

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**Item 64.7(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: B-OILER

Emission Point: 18001

Height (ft.): 76 Diameter (in.): 32  
NYTMN (km.): 4732.524 NYTME (km.): 605.633 Building: BLDG 18

Emission Point: 18002

Height (ft.): 76 Diameter (in.): 32  
NYTMN (km.): 4732.524 NYTME (km.): 605.633 Building: BLDG 18

**Item 64.8(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: C-AR001

Emission Point: 32260

Height (ft.): 41 Diameter (in.): 18  
NYTMN (km.): 4732.524 NYTME (km.): 605.633

**Item 64.9(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: F-LINE1

Emission Point: 32104

Height (ft.): 41 Diameter (in.): 13  
NYTMN (km.): 4732.3 NYTME (km.): 605.6 Building: BLDG 32

Emission Point: 32105

Height (ft.): 41 Diameter (in.): 13  
NYTMN (km.): 4732.3 NYTME (km.): 605.6 Building: BLDG 32

Emission Point: 32106

Height (ft.): 41 Diameter (in.): 13  
NYTMN (km.): 4732.3 NYTME (km.): 605.6 Building: BLDG 32

Emission Point: 32107

Height (ft.): 41 Diameter (in.): 13  
NYTMN (km.): 4732.3 NYTME (km.): 605.6 Building: BLDG 32

Emission Point: 32109

Height (ft.): 41 Diameter (in.): 16  
NYTMN (km.): 4732.3 NYTME (km.): 605.6 Building: BLDG 32

Emission Point: 32294

Height (ft.): 41 Diameter (in.): 26  
NYTMN (km.): 4732.3 NYTME (km.): 605.6 Building: BLDG 32



**Item 64.10(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-FTNKS

Emission Point: 32263

Height (ft.): 28

Diameter (in.): 4

NYTMN (km.): 4732.524 NYTME (km.): 605.633

**Condition 65: Process Definition By Emission Unit**  
**Effective between the dates of 05/19/2006 and Permit Expiration Date**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 65.1(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-4MKR1

Process: P14

Source Classification Code: 4-02-007-01

Process Description:

The 14-Maker process is used to coat paper or cloth substrate. Coated material is allowed to cure in the oven.

Emission Source/Control: 14CTR - Process

Emission Source/Control: 14FLX - Process

**Item 65.2(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-7MK19

Process: P17

Source Classification Code: 4-02-007-01

Process Description:

The 17-Maker process is used to coat a cloth or paper substrate with adhesive and grain. Coated material is allowed to set in an intermediate oven. Product is given a top coat of adhesive to hold the grain, and is then slowly cured in the final oven.

Emission Source/Control: 00272 - Control

Control Type: INCINERATOR AFTERBURNER

Emission Source/Control: 17FLX - Process

Emission Source/Control: 17GRV - Process

Emission Source/Control: 17HTS - Process

Emission Source/Control: 17MAK - Process

Emission Source/Control: 17SIZ - Process

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**Item 65.3(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 2-3MAKR

Process: 231

Source Classification Code: 4-02-011-01

Process Description:

THIS PROCESS CONSISTS OF COATING THE MATERIAL TO HOLD AN ABRASIVE GRAIN TO THE FILM. A TOP COAT IS THEN APPLIED. AFTER EACH COAT, THE PRODUCT IS CURED UNDER ULTRAVIOLET LAMPS AND FINALLY PASSED THROUGH THE FLEXOGRAPHIC PRINTER TO LABEL THE BACK OF THE PRODUCT WITH IDENTIFYING CODES.

Emission Source/Control: CT006 - Control

Control Type: FABRIC FILTER

Emission Source/Control: A2913 - Process

Emission Source/Control: PXM23 - Process

**Item 65.4(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-LINE1

Process: POA

Source Classification Code: 4-02-011-01

Process Description:

The A line process is used to prepare cloth substrate prior to manufacture of coated abrasive material.

Emission Source/Control: ALCTR - Process

**Item 65.5(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-LINE1

Process: POF

Source Classification Code: 4-02-007-01

Process Description:

THE F LINE PROCESS IS USED TO PREPARE CLOTH SUBSTRATE PRIOR TO THE MANUFACTURE OF COATED ABRASIVE MATERIAL.

Emission Source/Control: FLCTR - Process

**Item 65.6(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-9MKR1

Process: P09

Source Classification Code: 4-02-007-01

Process Description:

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THE 9 MAKER PROCESS IS USED PRIMARILY TO  
COAT ABRASIVE MATERIAL FOR RESEARCH AND  
DEVELOPMENT ACTIVITIES.

Emission Source/Control: 00206 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00267 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 09CTR - Process

**Item 65.7(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-7MK19  
Process: P19 Source Classification Code: 4-02-007-01  
Process Description:

PRIMARY OPERATING MODE. THE 19 MAKER  
PROCESS INVOLVES TWO OPERATIONS FOR  
MANUFACTURING SCREEN BACK. MAKING ENTAILS  
COATING A SCREEN SUBSTRATE WITH ADHESIVE  
AND GRAIN, AND CURING IN THE OVEN. SIZING  
INVOLVES GIVING A TOP COAT TO HOLD THE  
GRAIN, AND CURING IN THE OVEN

Emission Source/Control: 00251 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: 00272 - Control  
Control Type: INCINERATOR AFTERBURNER

Emission Source/Control: 19CTR - Process

Emission Source/Control: 19FLX - Process

**Item 65.8(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 2-3MAKR  
Process: 232 Source Classification Code: 4-02-011-01  
Process Description:

THIS PROCESS CONSISTS OF COATING THE  
BACKSIDE OF THE FILM AND DRYING THE COATING  
IN THE NATURAL GAS FIRED OVEN. GRAIN  
APPLICATION AND PRINTING DO NOT OCCUR IN  
THIS PROCESS.

Emission Source/Control: A2913 - Process

Emission Source/Control: OVN23 - Process

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**Item 65.9(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 2-3MAKR

Process: 233

Source Classification Code: 4-02-011-03

Process Description:

THIS PROCESS CONSISTS OF MIXING OF THE COATINGS IN THE MIX ROOM. THE MIXING KETTLES ARE CLEANED WITH A SOLVEN BASED CLEANING SOLUTION.

Emission Source/Control: CT006 - Control

Control Type: FABRIC FILTER

Emission Source/Control: A2913 - Process

**Item 65.10(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-OILER

Process: FO2

Source Classification Code: 1-02-005-01

Process Description:

0.25 % MAXIMUM SULFUR CONTENT #2 FUEL OIL WILL BE FIRED WHENEVER NEEDED.

Emission Source/Control: BOIL1 - Combustion

Design Capacity: 29.5 million BTUs per hour

Emission Source/Control: BOIL2 - Combustion

Design Capacity: 29.5 million BTUs per hour

**Item 65.11(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-OILER

Process: NG1

Source Classification Code: 1-02-006-02

Process Description: THE BOILERS WILL NORMALLY OPERATE ON NATURAL GAS.

Emission Source/Control: BOIL1 - Combustion

Design Capacity: 29.5 million BTUs per hour

Emission Source/Control: BOIL2 - Combustion

Design Capacity: 29.5 million BTUs per hour

**Item 65.12(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AR001

Process: PCR

Source Classification Code: 4-02-007-06

Process Description:

PRIMARY OPERATING MODE. THE MIX STATION

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IS USED TO PREPARE COATING FORMULATIONS  
THAT ARE USED AT THE INDIVIDUAL PRODUCTION  
LINES.

Emission Source/Control: 00260 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: MXSTN - Process

**Item 65.13(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-FTNKS

Process: PUF

Source Classification Code: 4-02-007-07

Process Description:

PRIMARY OPERATING MODE. EMISSIONS OCCUR  
ONLY DURING THE DELIVERY OF RESIN.

Emission Source/Control: 00263 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: TANK1 - Process

Emission Source/Control: TANK2 - Process

Emission Source/Control: TANK3 - Process



