

Facility DEC ID: 5170800038

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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 5-1708-00038/00044  
Effective Date: \_\_\_\_\_ Expiration Date: \_\_\_\_\_

Permit Issued To: PEARL LEATHER FINISHERS INC  
11-21 INDUSTRIAL PARK  
PO BOX 709  
JOHNSTOWN, NY 12095

Contact: JOHN RUGGIERO  
PEARL LEATHER FINISHERS INC  
PO BOX 709  
JOHNSTOWN, NY 12095  
(518) 762-4543

Facility: PEARL LEATHER FINISHERS INC  
11-21 INDUSTRIAL PARK  
JOHNSTOWN, NY 12095

Description:  
The facility plans on getting a Air State Facility (ASF) permit and surrender their Title V permit. The ASF will include four coating lines from four buildings. In general the spray booth/water wash units will discharge through a roof vent and the dryers will discharge through the side wall.

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: BETH A MAGEE  
NYSDEC - WARRENSBURG SUBOFFICE  
232 GOLF COURSE RD  
WARRENSBURG, NY 12885-1172

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.

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**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 3: Applications for permit renewals, modifications and transfers**  
**Applicable State Requirement: 6 NYCRR 621.11**

**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 the expiration of permits for Title V and 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 4: Permit modifications, suspensions or revocations by the Department**

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**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

The Department reserves the right to exercise all available authority 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 application for permit modification or renewal-REGION 5 HEADQUARTERS**

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

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator  
Region 5 Headquarters  
Division of Environmental Permits  
Route 86, PO Box 296  
Ray Brook, NY 12977-0296  
(518) 897-1234

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

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: PEARL LEATHER FINISHERS INC  
11-21 INDUSTRIAL PARK  
PO BOX 709  
JOHNSTOWN, NY 12095

Facility: PEARL LEATHER FINISHERS INC  
11-21 INDUSTRIAL PARK  
JOHNSTOWN, NY 12095

Authorized Activity By Standard Industrial Classification Code:  
3111 - LEATHER TANNING AND FINISHING

Permit Effective Date:

Permit Expiration Date:

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**FEDERALLY ENFORCEABLE CONDITIONS**  
DRAFT                      **\*\*\*\* 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.

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**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: 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 F: 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 G: 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 H: 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

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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 I: 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 J: 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 K: Permit Exclusion - ECL 19-0305**

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to

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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: Acceptable Ambient Air Quality  
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 200.6****Item 1.1:**

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.

**Condition 2: Open Fires - Prohibitions  
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 215.2****Item 2.1:**

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item 2.2**

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.

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- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**Condition 3: Maintenance of Equipment  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 3.1:**

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.

**Condition 4: Recycling and Salvage  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 201-1.7**

**Item 4.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 5: Prohibition of Reintroduction of Collected Contaminants to the air  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 201-1.8**

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**Item 5.1:**

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.

**Condition 6: Exempt Sources - Proof of Eligibility  
Effective for entire length of Permit****Applicable Federal Requirement:6 NYCRR 201-3.2 (a)****Item 6.1:**

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

**Condition 7: Trivial Sources - Proof of Eligibility  
Effective for entire length of Permit****Applicable Federal Requirement:6 NYCRR 201-3.3 (a)****Item 7.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

**Condition 8: Required Emissions Tests  
Effective for entire length of Permit****Applicable Federal Requirement:6 NYCRR 202-1.1****Item 8.1:**

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 9: Accidental release provisions.  
Effective for entire length of Permit****Applicable Federal Requirement:40 CFR Part 68****Item 9.1:**

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

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b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center  
 C/O CSC  
 8400 Corporate Dr  
 Carrollton, Md. 20785

**Condition 10: Recycling and Emissions Reduction**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40 CFR 82, Subpart F**

**Item 10.1:**

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

**Condition 11: Facility Permissible Emissions**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 11.1:**

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:

CAS No: 000067-56-1 Name: METHYL ALCOHOL	PTE: 9,500 pounds per year
CAS No: 000098-82-8 Name: BENZENE, (1-METHYLETHYL)	PTE: 9,500 pounds per year
CAS No: 000100-41-4 Name: ETHYLBENZENE	PTE: 9,500 pounds per year
CAS No: 000102-71-6 Name: 2,2,2-NITRILOTRIS ETHANOL	PTE: 9,400 pounds per year
CAS No: 000107-21-1 Name: 1,2-ETHANEDIOL	PTE: 9,500 pounds per year
CAS No: 000108-01-0 Name: 2-DIMETHYL AMINO ETHANOL	PTE: 20,000 pounds per year

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CAS No: 000111-42-2 Name: ETHANOL, 2,2'-IMINOBIS-	PTE: 9,500 pounds per year
CAS No: 000111-77-3 Name: 2-(2-METHOXYETHOXY)-ETHANOL	PTE: 9,500 pounds per year
CAS No: 000112-34-5 Name: ETHANOL, 2-(2-BUTOXYETHOXY)-	PTE: 9,500 pounds per year
CAS No: 000121-44-8 Name: N,N-DIETHYL ETHANAMINE	PTE: 5,550 pounds per year
CAS No: 000142-26-7 Name: ACETAMIDE, N-(2-HYDROXYETHYL)-	PTE: 14,000 pounds per year
CAS No: 000149-57-5 Name: 2-ETHYLHEXANOIC ACID	PTE: 9,500 pounds per year
CAS No: 000872-50-4 Name: 1-METHYL-2-PYRROLIDONE	PTE: 78,500 pounds per year
CAS No: 001330-20-7 Name: XYLENE, M, O & P MIXT.	PTE: 9,500 pounds per year
CAS No: 0NY100-00-0 Name: TOTAL HAP	PTE: 49,000 pounds per year
CAS No: 0NY998-00-0 Name: VOC	PTE: 98,000 pounds per year

**Condition 12: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 12.1:**

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 212-1.1 (a) (1)

**Item 12.2:**

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

**Item 12.3:**

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.



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**Item 12.4:**

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 12.5:**

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 12.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000872-50-4      1-METHYL-2-PYRROLIDONE

**Item 12.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In order to maintain ambient impacts below levels that would require an environmental rating of “A”, Methyl Pyrrolidone emissions from all facility operations will be limited to less 78,500 pounds during any consecutive 12 month period. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Methyl Pyrrolidone emissions will be calculated based upon the assumption that all Methyl Pyrrolidone used is emitted to the atmosphere. The amount of Methyl Pyrrolidone in the coatings used will be determined based upon the maximum amount identified in the applicable Safety Data Sheet (SDS).

This results in Methyl Pyrrolidone receiving a “B” Environmental Rating, thereby excepting this contaminant from applicability to 6 NYCRR Part 212 requirements.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Methyl

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Pyrrolidone. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: COATING  
Parameter Monitored: 1-METHYL-2-PYRROLIDONE  
Upper Permit Limit: 78,500 pounds per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 12 calendar month(s).

**Condition 13: Capping Monitoring Condition**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 13.1:**

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 201-6.1

**Item 13.2:**

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

**Item 13.3:**

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 13.4:**

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 13.5:**

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 13.6:**

The Compliance Demonstration activity will be performed for the Facility.

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Regulated Contaminant(s):

CAS No: 000111-42-2 ETHANOL, 2,2'-IMINOBIS-

**Item 13.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

Diethanol Amine emissions from all facility operations will be limited to less than 9,500 pounds during all consecutive 12 month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Diethanol Amine emissions will be calculated on the assumption that all Diethanol Amine used at the facility is emitted to the atmosphere.

To maintain status as a Non-major Facility, the individual HAPs are capped and must remain less than 9,500 pounds per year.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Diethanol Amine. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ETHANOL, 2,2'-IMINOBIS-

Upper Permit Limit: 9,500 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 14: Capping Monitoring Condition  
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR Subpart 201-7****Item 14.1:**

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:

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6 NYCRR 201-6.1

**Item 14.2:**

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

**Item 14.3:**

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 14.4:**

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 14.5:**

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 14.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000100-41-4      ETHYLBENZENE

**Item 14.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Ethyl Benzene emissions from all facility operations will be limited to less than 9,500 pounds during all consecutive 12 month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Ethyl Benzene emissions will be calculated on the assumption that all Ethyl Benzene used at the facility is emitted to the atmosphere.

To maintain status as a Non-major Facility, the individual HAPs are capped and must remain less than 9,500 pounds per year.

The facility owner or operator shall maintain a copy of

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all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Ethyl Benzene. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ETHYLBENZENE

Upper Permit Limit: 9,500 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 15: Capping Monitoring Condition**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 15.1:**

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 201-6.1

**Item 15.2:**

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

**Item 15.3:**

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 15.4:**

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 15.5:**

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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 15.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000098-82-8      BENZENE, (1-METHYLETHYL)

**Item 15.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Cumene emissions from all facility operations will be limited to less than 9,500 pounds during all consecutive 12 month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Cumene emissions will be calculated on the assumption that all Cumene used at the facility is emitted to the atmosphere.

To maintain status as a Non-major Facility, the individual HAPs are capped and must remain less than 9,500 pounds per year.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Cumene. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: BENZENE, (1-METHYLETHYL)

Upper Permit Limit: 9,500 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 16:      Capping Monitoring Condition  
Effective for entire length of Permit**

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**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 16.1:**

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 201-6.1

**Item 16.2:**

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

**Item 16.3:**

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 16.4:**

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 16.5:**

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 16.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000112-34-5      ETHANOL, 2-(2-BUTOXYETHOXY)-

**Item 16.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Butyl Carbitol (DG Monobutyl Ether) emissions from all facility operations will be limited to less than 9,500 pounds during all consecutive 12 month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Butyl Carbitol (DG Monobutyl Ether) emissions will be calculated on the

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assumption that all Butyl Carbitol (DG Monobutyl Ether) used at the facility is emitted to the atmosphere.

To maintain status as a Non-major Facility, the individual HAPs are capped and must remain less than 9,500 pounds per year.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Butyl Carbitol (DG Monobutyl Ether). Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ETHANOL, 2-(2-BUTOXYETHOXY)-

Upper Permit Limit: 9,500 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 17: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 17.1:**

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 201-6.1

**Item 17.2:**

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

**Item 17.3:**

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 17.4:**



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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 17.5:**

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 17.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000107-21-1      1,2-ETHANEDIOL

**Item 17.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Ethylene Glycol emissions from all facility operations will be limited to less than 9,500 pounds during all consecutive 12 month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Ethylene Glycol emissions will be calculated on the assumption that all Ethylene Glycol used at the facility is emitted to the atmosphere.

To maintain status as a Non-major Facility, the individual HAPs are capped and must remain less than 9,500 pounds per year.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Ethylene Glycol. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: 1,2-ETHANEDIOL

Upper Permit Limit: 9,500 pounds per year

Monitoring Frequency: MONTHLY

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Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 18: Capping Monitoring Condition  
 Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 18.1:**

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 201-6.1

**Item 18.2:**

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

**Item 18.3:**

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 18.4:**

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 18.5:**

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 18.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 18.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes  
 Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

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## Monitoring Description:

Emissions from all coating and solvent usage at the facility, including exempt & trivial sources, will be limited as follows:

Total HAPs less than or equal to 49,000 pounds per year.

This limit applies during all consecutive 12 month periods. Monthly inventories must be conducted to determine coating and solvent usage on a 12 month total, rolled monthly, basis. Records of the HAP makeup of all coatings and solvents shall be maintained at the facility. Calculations will assume that all HAPs used are emitted from the facility.

To maintain status as a Non-major Facility, the total HAPs are capped and must remain less than 49,000 pounds per year.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of total HAPs. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 49,000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 19: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 19.1:**

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:

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6 NYCRR 201-6.1

**Item 19.2:**

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

**Item 19.3:**

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 19.4:**

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 19.5:**

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 19.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 001330-20-7 XYLENE, M, O & P MIXT.

**Item 19.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Xylene emissions from all facility operations will be limited to less than 9,500 pounds during all consecutive 12 month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Xylene emissions will be calculated on the assumption that all Xylene used at the facility is emitted to the atmosphere.

To maintain status as a Non-major Facility, the individual HAPs are capped and must remain less than 9,500 pounds per year.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month

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total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Xylene. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: XYLENE, M, O &amp; P MIXT.

Upper Permit Limit: 9,500 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 20: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 20.1:**

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 212-1.1 (a) (1)

**Item 20.2:**

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

**Item 20.3:**

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 20.4:**

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 20.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement,

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for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 20.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000121-44-8      N,N-DIETHYL ETHANAMINE

**Item 20.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Leather Research Laboratory has tested several polyurethane resins for triethylamine content. These test results show the triethylamine content is below the manufacturer’s SDS content. This has been done for Quaker Color resins DM-831 (SDS % by weight of 0.4), NE-721FD (SDS % by weight of 1.5), PR-1238 (SDS % by weight of 0.9), and PR-1245 (SDS % by weight of 1.5). For emission estimates, half of the SDS % by weight is used to calculate emissions.

Tested polyurethane resins will be retested semiannually for the first year. After two successful semiannual tests, the polyurethane resins will be tested annually. After two successful annual tests, the polyurethane resins will be tested once per 5 years.

If polyurethane resin test results show an increase above half the SDS % by weight, the testing program will be restarted on a semiannual testing basis.

The facility owner or operator shall maintain a copy of all laboratory data used to calculate triethylamine content for a period of at least five years from the date of the record and shall make the records available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 21: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 21.1:**

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

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the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1

**Item 21.2:**

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

**Item 21.3:**

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 21.4:**

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 21.5:**

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 21.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 000067-56-1      METHYL ALCOHOL

**Item 21.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Methanol emissions from all facility operations will be limited to less than 9,500 pounds during all consecutive 12 month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Methanol emissions will be calculated on the assumption that all Methanol used at the facility is emitted to the atmosphere.

To maintain status as a Non-major Facility, the individual HAPs are capped and must remain less than 9,500 pounds per year.

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The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Methanol. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: METHYL ALCOHOL

Upper Permit Limit: 9,500 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 22: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 22.1:**

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 201-6.1

**Item 22.2:**

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

**Item 22.3:**

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 22.4:**

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.



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**Item 22.5:**

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 22.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000111-77-3      2-(2-METHOXYETHOXY)-ETHANOL

**Item 22.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Methyl Carbitol (2-methoxyethoxy) emissions from all facility operations will be limited to less than 9,500 pounds during all consecutive 12 month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Methyl Carbitol (2-methoxyethoxy) emissions will be calculated on the assumption that all Methyl Carbitol (2-methoxyethoxy) used at the facility is emitted to the atmosphere.

To maintain status as a Non-major Facility, the individual HAPs are capped and must remain less than 9,500 pounds per year.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Methyl Carbitol (2-methoxyethoxy). Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: 2-(2-METHOXYETHOXY)-ETHANOL

Upper Permit Limit: 9,500 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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**Condition 23: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 23.1:**

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 212-1.1 (a) (1)

**Item 23.2:**

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

**Item 23.3:**

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 23.4:**

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 23.5:**

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 23.6:**

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

Emission Unit: F-INISH

Regulated Contaminant(s):

CAS No: 000121-44-8      N,N-DIETHYL ETHANAMINE

**Item 23.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

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In order to maintain ambient impacts below levels that would require an environmental rating of “A”, Triethylamine emissions from all facility operations will be limited to less than 5,550 pounds during any consecutive 12 month period. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Triethylamine emissions will be calculated based upon the assumption that all Triethylamine used is emitted to the atmosphere. The amount of Triethylamine in the coatings used will be determined based upon the most recent Leather Research Laboratory (LRL) test data, if available, or the maximum amount identified in the applicable Safety Data Sheet (SDS), if LRL test data is not available.

This results in Triethylamine receiving a “B” Environmental Rating, thereby excepting this contaminant from applicability to 6 NYCRR Part 212 requirements.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Triethylamine. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: COATING MIXED  
Parameter Monitored: N,N-DIETHYL ETHANAMINE  
Upper Permit Limit: 5,550 pounds per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 12 calendar month(s).

**Condition 24: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 24.1:**

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 212-1.1 (a) (1)

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**Item 24.2:**

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

**Item 24.3:**

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 24.4:**

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 24.5:**

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 24.6:**

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

Emission Unit: F-INISH

Regulated Contaminant(s):

CAS No: 000142-26-7 ACETAMIDE, N-(2-HYDROXYETHYL)-

**Item 24.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In order to maintain ambient impacts below levels that would require an environmental rating of "A", N-(2-hydroxyethyl)acetamide emissions from all facility operations will be limited to less 14,000 pounds during any consecutive 12 month period. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. N-(2-hydroxyethyl)acetamide emissions will be calculated based upon the assumption that all N-(2-hydroxyethyl)acetamide used is emitted to the atmosphere. The amount of N-(2-hydroxyethyl)acetamide in the coatings used will be determined based upon the maximum amount identified in the applicable Safety Data

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Sheet (SDS).

This results in N-(2-hydroxyethyl)acetamide receiving a “B” Environmental Rating, thereby excepting this contaminant from applicability to 6 NYCRR Part 212 requirements.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of N-(2-hydroxyethyl)acetamide. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: COATING MIXED  
Parameter Monitored: ACETAMIDE, N-(2-HYDROXYETHYL)-  
Upper Permit Limit: 14,000 pounds per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 12 calendar month(s).

**Condition 25: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 25.1:**

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 212-1.1 (a) (1)

**Item 25.2:**

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

**Item 25.3:**

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 25.4:**

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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 25.5:**

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 25.6:**

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

Emission Unit: F-INISH

Regulated Contaminant(s):

CAS No: 000149-57-5      2-ETHYLHEXANOIC ACID

**Item 25.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

In order to maintain ambient impacts below levels that would require an environmental rating of “A”, 2-Ethylhexanoic acid emissions from all facility operations will be limited to less than 9,500 pounds during any consecutive 12 month period. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. 2-Ethylhexanoic acid emissions will be calculated based upon the assumption that all 2-Ethylhexanoic acid used is emitted to the atmosphere. The amount of 2-Ethylhexanoic acid in the coatings used will be determined based upon the maximum amount identified in the applicable Safety Data Sheet (SDS).

This results in 2-Ethylhexanoic acid receiving a “B” Environmental Rating, thereby excepting this contaminant from applicability to 6 NYCRR Part 212 requirements.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and

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submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of 2-Ethylhexanoic acid. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: COATING MIXED  
Parameter Monitored: 2-ETHYLHEXANOIC ACID  
Upper Permit Limit: 9,500 pounds per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 12 calendar month(s).

**Condition 26: Capping Monitoring Condition**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 26.1:**

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 212-1.1 (a) (1)

**Item 26.2:**

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

**Item 26.3:**

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 26.4:**

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 26.5:**

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 26.6:**

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

Emission Unit: F-INISH

Regulated Contaminant(s):

CAS No: 000108-01-0 2-DIMETHYL AMINO ETHANOL

**Item 26.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In order to maintain ambient impacts below levels that would require an environmental rating of “A”, Dimethylamino Ethanol emissions from all facility operations will be limited to less than 20,000 pounds during any consecutive 12 month period. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Dimethylamino Ethanol emissions will be calculated based upon the assumption that all used Dimethylamino Ethanol is emitted to the atmosphere. The amount of Dimethylamino Ethanol in the coatings used will be determined based upon the maximum amount identified in the applicable Safety Data Sheet (SDS).

This results in Dimethylamino Ethanol receiving a “B” Environmental Rating, thereby excepting this contaminant from applicability to 6 NYCRR Part 212 requirements.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Dimethylamino Ethanol. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING MIXED

Parameter Monitored: 2-DIMETHYL AMINO ETHANOL

Upper Permit Limit: 20,000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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

**Condition 27: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 27.1:**

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 212-1.1 (a) (1)

**Item 27.2:**

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

**Item 27.3:**

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 27.4:**

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 27.5:**

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 27.6:**

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

Emission Unit: F-INISH

Regulated Contaminant(s):

CAS No: 000102-71-6      2,2,2-NITRILOTRIS ETHANOL

**Item 27.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC

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## Monitoring Description:

In order to maintain ambient impacts below levels that would require an environmental rating of “A”, Triethanolamine emissions from all facility operations will be limited to less than 9,400 pounds during any consecutive 12 month period. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Triethanolamine emissions will be calculated based upon the assumption that all Triethanolamine used is emitted to the atmosphere. The amount of Triethanolamine in the coatings used will be determined based upon the maximum amount identified in the applicable Safety Data Sheet (SDS).

This results in Triethanolamine receiving a “B” Environmental Rating, thereby excepting this contaminant from applicability to 6 NYCRR Part 212 requirements.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Triethanolamine. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING MIXED

Parameter Monitored: 2,2,2-NITRILOTRIS ETHANOL

Upper Permit Limit: 9,400 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 28: Capping Monitoring Condition  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 28.1:**

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 201-6.1

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6 NYCRR 231-6.1

**Item 28.2:**

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

**Item 28.3:**

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 28.4:**

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 28.5:**

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 28.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 28.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Total VOC emissions from all facility operations will be limited to less than 98,000 pounds during all consecutive 12 month periods. Monthly inventories must be conducted to determine chemical usage on a 12 month total, rolled monthly, basis. Total VOC emissions will be calculated on the assumption that all VOC used at the facility is emitted to the atmosphere.

The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and

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submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of Total VOC. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
 Process Material: COATING  
 Parameter Monitored: VOC CONTENT  
 Upper Permit Limit: 98,000 pounds per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 29: Visible Emissions Limited**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 29.1:**

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 30: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 212-2.4 (b)**

**Item 30.1:**

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

Emission Unit: F-INISH

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

**Item 30.2:**

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. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications daily.

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These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission limit.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 31: Surface Coating- Prohibitions  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (c)**

**Item 31.1:**

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

- (i) coatings utilized at surface coating lines where control equipment has been installed to meet

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the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

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

**Condition 32: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)**

**Item 32.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-INISH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 32.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Water wash control devices (scrubbers) shall be cleaned at least two times per week, or after not more than 50 hours of operation, whichever occurs first. During the cleaning operations the scrubber media are removed from the unit and pressure washed to removed attached debris.

Documentation of cleaning operations (date, time, operator doing the cleaning, issues found and corrective action taken) shall be kept in an on site log book and maintained for a period of 5 years from the date of the record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 37: Compliance Demonstration  
Effective for entire length of Permit**

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Facility DEC ID: 5170800038

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (a)****Item 37.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-INISH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 37.2:**

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 from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). Observations must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam – see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions persist after corrections are made, the permittee will immediately notify the department and may be required to conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

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**\*\* NOTE \*\*** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

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: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 33: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)**

**Item 33.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-INISH

**Item 33.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.



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5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 34: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)**

**Item 34.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-INISH

**Item 34.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart 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;

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- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) clean hand held spray guns 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.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 12 calendar month(s).

**Condition 35: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-1.4 (e) (2)**

**Item 35.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-INISH

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

**Item 35.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The maximum permitted pounds of VOC per gallon (minus water and excluded VOC) of coating at application, for leather coating lines is 5.8

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The facility owner or operator shall maintain a copy of all data used to calculate maximum permitted pounds of VOC per gallon at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: COATING LINES  
Parameter Monitored: VOC CONTENT  
Upper Permit Limit: 5.8 pounds per gallon  
Monitoring Frequency: SINGLE OCCURRENCE  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 36: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 228-1.6 (h)**

**Item 36.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: F-INISH

**Item 36.2:**

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 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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**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: Emergency Defense - 6 NYCRR 201-1.5**

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records

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required to comply with the request within sixty working days of written notification by the Department.

Item C: **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 38: Contaminant List  
Effective for entire length of Permit**

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

**Item 38.1:**

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

CAS No: 000067-56-1  
Name: METHYL ALCOHOL

CAS No: 000098-82-8  
Name: BENZENE, (1-METHYLETHYL)

CAS No: 000100-41-4  
Name: ETHYLBENZENE

CAS No: 000102-71-6  
Name: 2,2,2-NITRILOTRIS ETHANOL

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CAS No: 000107-21-1  
Name: 1,2-ETHANEDIOL

CAS No: 000108-01-0  
Name: 2-DIMETHYL AMINO ETHANOL

CAS No: 000111-42-2  
Name: ETHANOL, 2,2'-IMINOBIS-

CAS No: 000111-77-3  
Name: 2-(2-METHOXYETHOXY)-ETHANOL

CAS No: 000112-34-5  
Name: ETHANOL, 2-(2-BUTOXYETHOXY)-

CAS No: 000121-44-8  
Name: N,N-DIETHYL ETHANAMINE

CAS No: 000142-26-7  
Name: ACETAMIDE, N-(2-HYDROXYETHYL)-

CAS No: 000149-57-5  
Name: 2-ETHYLHEXANOIC ACID

CAS No: 000872-50-4  
Name: 1-METHYL-2-PYRROLIDONE

CAS No: 001330-20-7  
Name: XYLENE, M, O & P MIXT.

CAS No: 0NY075-00-0  
Name: PARTICULATES

CAS No: 0NY100-00-0  
Name: TOTAL HAP

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

**Condition 39: Malfunctions and start-up/shutdown activities  
Effective for entire length of Permit**

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

**Item 39.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, 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

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the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 40: Emission Unit Definition  
Effective for entire length of Permit**

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

**Item 40.1:**

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

Emission Unit: F-INISH

Emission Unit Description:

Leather finishing operations including four (4) roll coaters, thirteen (13) spray booths, nine (9) water wash control devices, twelve (12) dryers, and twentyfour (24) emission points.

Building(s): 01  
02  
03  
04

**Condition 41: Renewal deadlines for state facility permits  
Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR 201-5.2 (c)**

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**Item 41.1:**

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Condition 42: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR 201-5.3 (c)**

**Item 42.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 42.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 5  
232 Golf Course Rd.  
Warrensburg, NY 12885

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 43: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR 201-5.4**

**Item 43.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 43.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- (a) An application for permit modification must be submitted by the owner or operator of a facility, subject to the provisions of section 201-5.2 of this Subpart, prior to making any of the following changes at an existing facility:
- (1) modifications to existing emission sources as defined under section 200.1 of this Title;



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- (2) the addition of a new emission source;
- (3) changes to any existing permit terms or conditions;
- or
- (4) changes that cause the facility to become subject to any additional requirements or regulations under this Title.

(b) The modified permit must be issued before the facility owner or operator may commence construction or operation of the requested modifications.

(c) The owner or operator of a facility subject to this Subpart must notify the department in writing as described in subdivision (d) of this section at least 30 calendar days in advance of making any of the changes described in paragraphs (1) through (3) of this subdivision, and maintain records of the date and description of such change for a period of at least five years. These records must be made available for review by department representatives upon request.

- (1) the relocation of emission points within a facility;
- (2) the emission of any air pollutant not previously authorized or emitted in accordance with a permit issued by the department; and
- (3) the installation or alteration of any air cleaning installations, device, or control equipment.

(d) Advance notifications required by subdivision (c) of this section shall include the following information:

- (1) identification of the emission unit, process(es), emission source(s), and emission point(s) affected by the proposed change;
- (2) date on which the change is to occur;
- (3) description of the proposed change;
- (4) if appropriate, the identification and description of emissions control technology and compliance terms; and
- (5) the identification of all contaminants emitted by the affected emission sources and calculations of the emission rate potential, potential to emit, and projected actual annual emission rates after the proposed change.

(e) Changes at a facility that meet all of the criteria in paragraphs (1) through (3) of this subdivision may not require modification of the permit and may be conducted without the prior approval of the department. The owner or operator of the facility must maintain records of the date and description of each such change consistent with the provisions of subdivision (d) of this section for a period of at least five years. These records must be made available for review by department representatives upon request.

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- (1) Changes that do not cause facility emissions to exceed any emission limitation or other condition in the facility’s permit.
- (2) Changes that do not cause the facility to become subject to any additional regulations or requirements under this Title.
- (3) Changes that do not seek to establish or modify a federally-enforceable emission cap or limit.
  
- (f) The department may require a permit modification to impose applicable requirements or permit conditions if it determines that changes proposed pursuant to the requirements of this section do not meet the criteria under subdivision (e) of this section, or that the changes may have a significant air quality impact. In such cases, the department may require that the owner or operator not undertake the proposed change until it completes a more detailed review. The department’s determination shall include a listing of information necessary to further review the proposed change.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 44: Air pollution prohibited  
Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 44.1:**

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

**Condition 45: Emission Point Definition By Emission Unit  
Effective for entire length of Permit**

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

**Item 45.1:**

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

Emission Unit: F-INISH

Permit ID: 5-1708-00038/00044

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Emission Point: 00001	Height (ft.): 28	Diameter (in.): 31	
	NYTMN (km.): 4764.084	NYTME (km.): 552.615	Building: 01
Emission Point: 00003	Height (ft.): 28	Diameter (in.): 31	
	NYTMN (km.): 4764.082	NYTME (km.): 552.625	Building: 01
Emission Point: 00004	Height (ft.): 12	Diameter (in.): 31	
	NYTMN (km.): 4764.08	NYTME (km.): 552.635	Building: 01
Emission Point: 00005	Height (ft.): 12	Diameter (in.): 31	
	NYTMN (km.): 4764.079	NYTME (km.): 552.644	Building: 01
Emission Point: 00006	Height (ft.): 28	Diameter (in.): 31	
	NYTMN (km.): 4764.079	NYTME (km.): 552.651	Building: 01
Emission Point: 00007	Height (ft.): 12	Diameter (in.): 31	
	NYTMN (km.): 4764.071	NYTME (km.): 552.615	Building: 01
Emission Point: 00008	Height (ft.): 4	Diameter (in.): 28	
	NYTMN (km.): 4764.069	NYTME (km.): 552.62	Building: 01
Emission Point: 00009	Height (ft.): 2	Diameter (in.): 28	
	NYTMN (km.): 4764.069	NYTME (km.): 552.627	Building: 02
Emission Point: 00010	Height (ft.): 28	Diameter (in.): 31	
	NYTMN (km.): 4764.068	NYTME (km.): 552.635	Building: 02
Emission Point: 00012	Height (ft.): 12	Diameter (in.): 31	
	NYTMN (km.): 4764.065	NYTME (km.): 552.621	Building: 02
Emission Point: 00013	Height (ft.): 28	Diameter (in.): 31	
	NYTMN (km.): 4764.064	NYTME (km.): 552.627	Building: 02
Emission Point: 00015	Height (ft.): 10	Diameter (in.): 33	
	NYTMN (km.): 4764.061	NYTME (km.): 552.638	Building: 03
Emission Point: 00016	Height (ft.): 28	Diameter (in.): 31	
	NYTMN (km.): 4764.06	NYTME (km.): 552.644	Building: 03
Emission Point: 00017			

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Height (ft.): 8	Diameter (in.): 31		
NYTMN (km.): 4764.059	NYTME (km.): 552.65	Building: 03	
Emission Point: 00018			
Height (ft.): 28	Diameter (in.): 31		
NYTMN (km.): 4764.057	NYTME (km.): 552.656	Building: 03	
Emission Point: 00019			
Height (ft.): 10	Diameter (in.): 31		
NYTMN (km.): 4764.057	NYTME (km.): 552.663	Building: 03	
Emission Point: 00020			
Height (ft.): 8	Diameter (in.): 31		
NYTMN (km.): 4764.062	NYTME (km.): 552.61	Building: 04	
Emission Point: 00021			
Height (ft.): 24	Diameter (in.): 31		
NYTMN (km.): 4764.06	NYTME (km.): 552.615	Building: 04	
Emission Point: 00022			
Height (ft.): 12	Diameter (in.): 31		
NYTMN (km.): 4764.064	NYTME (km.): 552.649	Building: 02	
Emission Point: 00023			
Height (ft.): 8	Diameter (in.): 33		
NYTMN (km.): 4764.058	NYTME (km.): 552.627	Building: 04	
Emission Point: 00024			
Height (ft.): 8	Diameter (in.): 33		
NYTMN (km.): 4764.057	NYTME (km.): 552.632	Building: 04	
Emission Point: 00029			
Height (ft.): 28	Diameter (in.): 31		
NYTMN (km.): 4764.08	NYTME (km.): 552.652	Building: 03	
Emission Point: 00032			
Height (ft.): 24	Diameter (in.): 31		
NYTMN (km.): 4764.06	NYTME (km.): 552.615	Building: 04	
Emission Point: 00033			
Height (ft.): 7	Diameter (in.): 33		
NYTMN (km.): 4764.059	NYTME (km.): 552.621	Building: 04	

**Condition 46: Process Definition By Emission Unit  
Effective for entire length of Permit**

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

**Item 46.1:**

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

Emission Unit: F-INISH	
Process: 101	Source Classification Code: 3-20-999-97

Permit ID: 5-1708-00038/00044

Facility DEC ID: 5170800038

Process Description:

Leather finishing (surface coating) operation in Building #1, Sprayline #4 consisting of one (1) test spray booth, one (1) roll coater, three (3) water wash spray booths, three (3) water wash control devices, and three (3) dryers.

Emission Source/Control: 0001C - Control  
Control Type: WATER CURTAIN

Emission Source/Control: 0003C - Control  
Control Type: WATER CURTAIN

Emission Source/Control: 0006C - Control  
Control Type: WATER CURTAIN

Emission Source/Control: 00001 - Process

Emission Source/Control: 00002 - Process

Emission Source/Control: 00003 - Process

Emission Source/Control: 00004 - Process

Emission Source/Control: 00006 - Process

Emission Source/Control: 00007 - Process

Emission Source/Control: 00032 - Process

Emission Source/Control: 00034 - Process

**Item 46.2:**

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

Emission Unit: F-INISH

Process: 102

Source Classification Code: 3-20-999-97

Process Description:

Leather finishing (surface coating) operation in Building #2, Sprayline #3 consisting of one (1) test spray booth, one (1) roll coater, two (2) water wash spray booths, and two (2) water wash control devices, and three (3) dryers.

Emission Source/Control: 0010C - Control  
Control Type: WATER CURTAIN

Emission Source/Control: 0013C - Control  
Control Type: WATER CURTAIN

Emission Source/Control: 00008 - Process

Emission Source/Control: 00009 - Process

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Emission Source/Control: 00010 - Process

Emission Source/Control: 00011 - Process

Emission Source/Control: 00013 - Process

Emission Source/Control: 00014 - Process

Emission Source/Control: 00033 - Process

**Item 46.3:**

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

Emission Unit: F-INISH

Process: 103

Source Classification Code: 3-20-999-97

Process Description:

Leather finishing (surface coating) operation in Building #3, Sprayline #1 consisting of one (1) test spray booth, one (1) roll coater, two (2) water wash spray booths, and two (2) water wash control devices, and three (3) dryers.

Emission Source/Control: 0019C - Control

Control Type: WATER CURTAIN

Emission Source/Control: 0022C - Control

Control Type: WATER CURTAIN

Emission Source/Control: 00015 - Process

Emission Source/Control: 00016 - Process

Emission Source/Control: 00017 - Process

Emission Source/Control: 00019 - Process

Emission Source/Control: 00020 - Process

Emission Source/Control: 00022 - Process

Emission Source/Control: 00023 - Process

**Item 46.4:**

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

Emission Unit: F-INISH

Process: 104

Source Classification Code: 3-20-999-97

Process Description:

Leather finishing (surface coating) operation in Building #4, Sprayline #2 consisting of one (1) test spray booth, one (1) roll coater, two (2) water wash spray booths, and two (2) water wash control devices, and three (3) dryers.

Emission Source/Control: 0026C - Control

Permit ID: 5-1708-00038/00044

Facility DEC ID: 5170800038

Control Type: WATER CURTAIN

Emission Source/Control: 0028C - Control  
Control Type: WATER CURTAIN

Emission Source/Control: 00024 - Process

Emission Source/Control: 00025 - Process

Emission Source/Control: 00026 - Process

Emission Source/Control: 00027 - Process

Emission Source/Control: 00028 - Process

Emission Source/Control: 00029 - Process

Emission Source/Control: 00041 - Process