

New York State Department of Environmental Conservation

Permit ID: 6-2109-00023/02001

Facility DEC ID: 6210900023



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To:EMPIRE FIBERGLASS PRODUCTS
RIVERSIDE INDUSTRIAL PARK
LITTLE FALLS, NY 13365

Facility: EMPIRE FIBERGLASS PRODUCTS
RIVERSIDE INDUSTRIAL PARK
LITTLE FALLS, NY 13365

Authorized Activity By Standard Industrial Classification Code:
2823 - CELLULOSIC MAN-MADE FIBERS
3089 - PLASTICS PRODUCTS, NEC

Permit Effective Date: 03/02/2016

Permit Expiration Date: 03/01/2026



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

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

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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



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

Item F: Recycling and Salvage - 6 NYCRR 201-1.7

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

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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



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

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

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

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

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Facility Permissible Emissions

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Item 2.5:

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 2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000100-42-5 STYRENE

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Facility owner shall ensure that emissions of individual Hazardous Air Pollutants (HAP) remain less than 9.36 tons during any 12 month period.

Facility owner must maintain records that verify the facility's monthly HAP emissions. These records must be maintained at the facility for a period of five years.

Reports will be submitted annually, in a format acceptable to the commissioner's representative, which document that the facility's total HAP emissions over any consecutive 12 month period were below 9.36 tons. The annual reports must include information that documents the HAP emissions from each emission source at the facility, including exempt and trivial activities. The report must also include all emission factors and all production data used in calculating the monthly HAP emissions.

Any noncompliance with the HAP emission limit in this condition must be reported by sending a copy of such record to the NYSDEC, Region 6, within 30 days of the occurrence.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: PRODUCT

Parameter Monitored: STYRENE

Upper Permit Limit: 9.36 tons per year

Monitoring Frequency: ANNUALLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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



Condition 3: Capping Monitoring Condition
Effective between the dates of 03/02/2016 and 03/01/2026

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 3.1:

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

6 NYCRR 201-6.1 (a)

Item 3.2:

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

Item 3.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 3.4:

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

Item 3.5:

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

Item 3.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
Facility owner shall ensure that emissions of total



Volatile Organic Compounds (VOC) remain less than 49 tons during any 12 month period.

Facility owner must maintain records that verify the facility's 12 month VOC emissions. These records must be maintained at the facility for a period of five years.

Reports will be submitted annually, in a format acceptable to the commissioner's representative, which document that the facility's total VOC emissions over any consecutive 12 month period were below 49 tons. The annual reports must include information that documents the HAP emissions from each emission source at the facility, including exempt and trivial activities. The report must also include all emission factors and all production data used in calculating the monthly HAP emissions.

Any noncompliance with the HAP emission limit in this condition must be reported by sending a copy of such record to the NYSDEC, Region 6, within 30 days of occurrence.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: VOC's

Upper Permit Limit: 49 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

Condition 4: Capping Monitoring Condition
Effective between the dates of 03/02/2016 and 03/01/2026

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 4.1:

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

6 NYCRR 201-6.1 (a)
40 CFR Part 63, Subpart WWWW

Item 4.2:

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

Item 4.3:

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The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 4.4:

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 4.5:

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 4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Facility owner shall ensure that emissions of total Hazardous Air Pollutants (HAP) remain less than 23 tons during any 12 month period.

Facility owner must maintain records that verify the facility's monthly HAP emissions. These records must be maintained at the facility for a period of five years.

Reports will be submitted annually, in a format acceptable to the commissioner's representative, which document that the facility's total HAP emissions over any consecutive 12 month period were below 23 tons. The annual reports must include information that documents the HAP emissions from each emission source at the facility, including exempt and trivial activities. The report must also include all emission factors and all production data used in calculating the monthly HAP emissions.

Any noncompliance with the HAP emission limit in this

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condition must be reported by sending a copy of such record to the NYSDEC, Region 6, within 30 days of the occurrence.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: PRODUCT
Parameter Monitored: TOTAL HAP
Upper Permit Limit: 23 tons per year
Monitoring Frequency: ANNUALLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due every 12 calendar month(s).

Condition 5: Air pollution prohibited
Effective between the dates of 03/02/2016 and 03/01/2026

Applicable Federal Requirement:6 NYCRR 211.1

Item 5.1:

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.

Condition 6: Compliance Demonstration
Effective between the dates of 03/02/2016 and 03/01/2026

Applicable Federal Requirement:6 NYCRR 212-1.5 (g)

Item 6.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000100-42-5 STYRENE

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall limit potential to emit of Styrene to that amount which will maintain annual impacts below Annual Guideline Concentrations (AGC), and Short term guideline concentrations (SGC) as predicted by DAR-1, and aerscreen, and meet the table 4 criteria. The facility shall monitor the use of spray guns for resin and gel-coat



applications on a daily basis, and total yearly plant operation. To demonstrate compliance with this limit the facility shall perform the following:

Facility shall determine total time the spray guns for resin and gel-coat applications were used each day of plant operation, and determine total plant operation time. These records must be kept for five years.

Reports will be submitted annually, in a format acceptable to the commissioner's representative, which document the total time the spray guns were used on a daily basis and the total time the facility operated on a yearly basis. This will ensure that the facility will meet ambient guideline concentration (AGC), short term guidance concentrations (SGC), and table 4.

Any noncompliance with the air toxic contaminants emission limit in this condition must be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Monitoring Frequency: DAILY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due every 12 calendar month(s).

Condition 7: Compliance Demonstration
Effective between the dates of 03/02/2016 and 03/01/2026

Applicable Federal Requirement:6 NYCRR 212-1.5 (g)

Item 7.1:
The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000100-42-5 STYRENE

Item 7.2:
Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Facility shall limit potential to emit of Styrene to that amount which will maintain annual impacts below Annual Guideline Concentrations (AGC), and Short term guideline concentrations (SGC) as predicted by DAR-1, and aerscreen, and meet the table 4 criteria. The facility shall use controlled spraying techniques as described from the completed CFA OPEN Molding Styrene Emission Test Project



document. The facility shall also limit the use of resins and gel-coats to ensure that styrene emission shall not exceed 9.36 tons per year per 12 month rolling total. To demonstrate compliance with this limit the facility shall perform the following:

Facility shall determine material usage on a monthly basis, and incorporate it into a twelve month rolling total, and using emission factors for each material, determine air toxic emissions on a twelve month rolling total. These records must be kept for five years.

Reports will be submitted annually, in a format acceptable to the commissioner's representative, which document that the facility's styrene emissions are below levels the 9.36 tons per year, in order to meet ambient guideline concentration (AGC), short term guidance concentrations (SGC), and table 4. The annual reports must include information that documents the production rates, the air toxics emitted.

Any noncompliance with the air toxic contaminants emission limit in this condition must be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: STYRENE
Upper Permit Limit: 9.36 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2017.
Subsequent reports are due every 12 calendar month(s).

Condition 8: Compliance Demonstration
Effective between the dates of 03/02/2016 and 03/01/2026

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 8.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:
Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:
No facility owner or operator shall cause or allow

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emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Emission Testing Using Approved Procedures
Effective between the dates of 03/02/2016 and 03/01/2026**

Applicable Federal Requirement:6 NYCRR 212-1.7 (a)

Item 9.1:

a) Facility owners and/or operators of a process emission source required by the department to demonstrate compliance with this Part may be required to conduct capture efficiency and/or stack emissions testing using acceptable and approved procedures pursuant to Part 202 of this Title.



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

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

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

Item B: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.

Condition 10: Contaminant List
Effective between the dates of 03/02/2016 and 03/01/2026



Applicable State Requirement:ECL 19-0301

Item 10.1:

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

CAS No: 000100-42-5
Name: STYRENE

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

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

**Condition 11: Malfunctions and start-up/shutdown activities
Effective between the dates of 03/02/2016 and 03/01/2026**

Applicable State Requirement:6 NYCRR 201-1.4

Item 11.1:

(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 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.

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(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 12: Emission Unit Definition
Effective between the dates of 03/02/2016 and 03/01/2026

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 12.1:

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

Emission Unit: 1-00000

Emission Unit Description:

There are two identical fabrication booths, each with its own exhaust fan and filter system located at the back of the empire building. The booths are used for the application of gelcoats and resins to various molds. There is a total of 5 guns (3 resin guns and 2 gelcoat guns) at the facility. However, only two guns are used at any given time.

Building(s): B1

Item 12.2:

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

Emission Unit: 2-00000

Emission Unit Description:

Various hand lay up operations take place just outside the fabrication booths.

Building(s): B1

Item 12.3:

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

Emission Unit: 3-00000

Emission Unit Description:

A close mold - vacuum bagging operation (Resin Transfer Molding) will be located in building 2. This process will be used to manufacture the new product line. The new process will replace some of the open molding that is currently taking place in building 1.

Building(s): B2

Item 12.4:

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

Emission Unit: 4-00000

Emission Unit Description:

A third spray booth, with its own exhaust will be

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installed in building 2 for gel coat operations related to the new closed mold process (Resin Transfer Molding)

Building(s): B2

Condition 13: Renewal deadlines for state facility permits
Effective between the dates of 03/02/2016 and 03/01/2026

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

Item 13.1:

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 14: Compliance Demonstration
Effective between the dates of 03/02/2016 and 03/01/2026

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

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

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 6
State Office Building
317 Washington Ave.
Watertown, NY 13601

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 15: Visible Emissions Limited
Effective between the dates of 03/02/2016 and 03/01/2026

Applicable State Requirement:6 NYCRR 211.2

Item 15.1:

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.



**** Emission Unit Level ****

Condition 16: Emission Point Definition By Emission Unit
Effective between the dates of 03/02/2016 and 03/01/2026

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 16.1:

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

Emission Unit: 1-00000

Emission Point: VENT1

Height (ft.): 4 Diameter (in.): 34

NYTMN (km.): 4764.774 NYTME (km.): 510.786 Building: B1

Emission Point: VENT2

Height (ft.): 6 Diameter (in.): 34

NYTMN (km.): 4764.771 NYTME (km.): 510.784 Building: B1

Item 16.2:

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

Emission Unit: 2-00000

Emission Point: VENT3

Height (ft.): 24 Diameter (in.): 18

NYTMN (km.): 4764.768 NYTME (km.): 510.781 Building: B1

Emission Point: VENT4

Height (ft.): 24 Diameter (in.): 18

NYTMN (km.): 4764.765 NYTME (km.): 510.78 Building: B1

Item 16.3:

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

Emission Unit: 4-00000

Emission Point: VENT5

Height (ft.): 30 Diameter (in.): 24

NYTMN (km.): 4764.649 NYTME (km.): 510.739 Building: B2

Condition 17: Process Definition By Emission Unit
Effective between the dates of 03/02/2016 and 03/01/2026

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1:

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



Emission Unit: 1-00000
Process: GCA Source Classification Code: 3-08-007-22
Process Description:
Gelcoat application is a process in which gelcoat is
sprayed onto a mold to obtain certain color properties.

Emission Source/Control: 00GC1 - Process
Design Capacity: 10 pounds per minute

Item 17.2:

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

Emission Unit: 1-00000
Process: MNA Source Classification Code: 3-08-007-24
Process Description:
Mechanical non-atomized spray application is a process in
which glass strands are chopped and sprayed simultaneously
with resin onto a mold.

Emission Source/Control: 000R1 - Process
Design Capacity: 8 pounds per minute

Emission Source/Control: 000R2 - Process
Design Capacity: 8 pounds per minute

Emission Source/Control: 000R3 - Process
Design Capacity: 8 pounds per minute

Item 17.3:

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

Emission Unit: 2-00000
Process: HLU Source Classification Code: 3-08-007-23
Process Description:
Hand lay up is a process in which resin and catalyst are
mixed together in a bucket and then applied to fiberglass
mats or wovens.

Emission Source/Control: 00HLU - Process

Item 17.4:

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

Emission Unit: 3-00000
Process: VBA Source Classification Code: 3-08-007-36
Process Description:
Resin Transfer Molding is a process in which the
reinforcement is positioned in the mold and the mold is
closed and clamped. The resin is then injected under
pressure using a mix/meter injection equipment in a vacuum
and the part is cured in the mold.



Emission Source/Control: 000VB - Process

Item 17.5:

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

Emission Unit: 4-00000

Process: GCS

Source Classification Code: 3-08-007-22

Process Description:

Gelcoat application is a process in which gelcoat is sprayed onto a mold to obtain certain color properties.

Emission Source/Control: 00GC2 - Process

Design Capacity: 10 pounds per minute

