



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-3013-00065/00017
Mod 0 Effective Date: 12/03/2018 Expiration Date: 12/02/2028
Mod 1 Effective Date: 01/16/2019 Expiration Date: 12/02/2028

Permit Issued To: VARFLEX CORP
512 W COURT ST
ROME, NY 13440-4010

Contact: DANIEL BURGDORF
VARFLEX CORPORATION
512 W COURT ST
ROME, NY 13440
(315) 336-4400

Facility: VARFLEX CORPORATION
512 W COURT ST
ROME, NY 13440

Contact: BRIAN D PERRY
VARFLEX
512 W COURT ST
ROME, NY 13440
(315) 336-4400

Description:

The Department has received from Varflex Corporation, a request/application for a new Air State Facility Permit whose purpose is to replace the existing Title V Air Permit, which subsequently will become expired. This State Facility Permit's purpose will be to operate air pollution sources at Varflex's plant. The Department has drafted, pursuant to Article 19 (Air Pollution Control) of the Environmental Conservation Law, this State Facility Permit for this facility. The facility is located at Varflex Corporation, 512 West Court Street, in the City of Rome, in Oneida County and in the State of New York. This facility is engaged in the manufacture of coated and uncoated fiberglass insulating sleeving for electrical conductors and for other components. The Standard Industrial Classification representative of this facility is 3644 (Noncurrent Carrying Wiring Devices) and 3699 (Electrical Equipment & Supply). The primary source of air emissions originates from web-fabric surface coating operations. With respect to air pollution regulation, the emissions of concern at Varflex are VOC, HAP and particulate matter. The facility has elected to cap VOC and



HAP emissions below the Major Source Threshold. Varflex is subject primarily to 6 NYCRR Part 228, which regulates surface coating operations at this Minor source. Varflex operates an air pollution control device (a thermal oxidizer), which significantly reduces VOC and HAP emissions to the atmosphere.

The draft permit with all conditions is available for review in the Region 6 NYSDEC sub-office in Utica, NY.

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: TERRY R TYOE
NYSDEC - UTICA SUBOFFICE
207 GENESEE ST
UTICA, NY 13501-2885

Authorized Signature: _____ Date: ___ / ___ / ___



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA



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
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 6
SUBOFFICE - UTICA
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 6 Sub-office
Division of Environmental Permits
State Office Building, 207 Genesee Street
Utica, NY 13501-2885
(315) 793-2555

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: VARFLEX CORP
512 W COURT ST
ROME, NY 13440-4010

Facility: VARFLEX CORPORATION
512 W COURT ST
ROME, NY 13440

Authorized Activity By Standard Industrial Classification Code:
3644 - NONCURRENT-CARRYING WIRING DEVICES
3699 - ELECTRICAL EQUIPMENT & SUPPLY

Mod 0 Permit Effective Date: 12/03/2018

Permit Expiration Date: 12/02/2028

Mod 1 Permit Effective Date: 01/16/2019

Permit Expiration Date: 12/02/2028



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 2 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 22 6 NYCRR 211.2: Visible Emissions Limited
- 23 6 NYCRR 211.2: Compliance Demonstration
- 6 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 7 6 NYCRR 212-1.7 (a): Compliance Demonstration
- 8 6 NYCRR 212-1.7 (b) (1): Compliance Demonstration
- 9 6 NYCRR 212-2.4 (a): Compliance Demonstration
- 10 6 NYCRR 226.3 (a): Compliance Demonstration
- 11 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 12 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 13 6 NYCRR 228-1.4 (e) (2): Compliance Demonstration
- 14 6 NYCRR 228-1.5 (b): Compliance Demonstration
- 15 6 NYCRR 228-1.6 (b): Compliance Demonstration

Emission Unit Level

- 16 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 17 ECL 19-0301: Contaminant List
- 18 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 19 6 NYCRR Subpart 201-5: Emission Unit Definition
- 20 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 21 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 1-1 6 NYCRR 201-5.4 (e): Compliance Demonstration
- 5 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 24 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 25 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: 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 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 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: Non Applicable requirements
Effective between the dates of 12/03/2018 and 12/02/2028**

Applicable Federal Requirement: 6 NYCRR 201-6.4 (g)

Item 1.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6 NYCRR 226.2 (g)

Reason: Reason: Facility operates various cold-cleaning degreasing units. Remote-reservoir cold cleaning degreasing unit/s would be trivial per 6NYCRR201-3.3(c)(49), any freeboard-regulated degreaser would be exempt per 6NYCRR201-3.2(c)(39) and non-remote reservoir unit/s that hold less than two gallons each would be trivial per 6NYCRR201-3.3(c)(51). Due to the less than two gallons capacity, the latter units may utilize xylene (vapor pressure = 7mmHG). Varflex shall calculate degreaser VOC and HAP emissions from solvent usage records and current MSDS information. Degreaser emissions shall be separately itemized and then added into total facility VOC/HAP emissions on the Annual Monitoring Report. MSDS records shall be retained onsite. Records shall be maintained for a minimum five year period. Note: Varflex is free to utilize zero or any number of these exempt or trivial sources.

40 CFR Part 63, Subpart OOOO

Reason: Reason: This regulation cannot apply as Varflex is not a major source for OHAPs.

40 CFR Part 64

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



Reason: Reason: Compliance Assurance Monitoring (CAM Rule) has been deemed to be NOT APPLICABLE to Varflex Corporation as the EPA relevant standard, 40 CFR 63-Subpart OOOO was proposed after the applicability threshold date of 11/15/1990. Further, Varflex has capped out of Title V - in this stature, CAM cannot apply.

**Condition 2: Facility Permissible Emissions
Effective between the dates of 12/03/2018 and 12/02/2028**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

per year	CAS No: 0NY100-00-0 (From Mod 1)	PTE: 9,000 pounds
	Name: TOTAL HAP	
per year	CAS No: 0NY998-00-0 (From Mod 1)	PTE: 48,000 pounds
	Name: VOC	

**Condition 3: Capping Monitoring Condition
Effective between the dates of 12/03/2018 and 12/02/2028**

Applicable Federal Requirement:6 NYCRR Subpart 201-7

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)
- 6 NYCRR 212-3.1 (a) (2)
- 6 NYCRR Subpart 231-1

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: 0NY100-00-0 TOTAL HAP

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

CAP:

Facility owner shall ensure that cumulative emissions of Hazardous Air Pollutants (HAP), including those from permitted, exempt, and trivial sources, will remain less than 9,000 pounds during any consecutive 365 day period.

RECORDS:

Facility owner shall maintain records that verify the facility's monthly HAP emissions. These records shall be maintained at the facility for a minimum five year period.

REPORTS:

Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's HAP emissions during any consecutive 365 day period had been maintained below 9,000 pounds. The annual report shall include information that documents the HAP emissions from each emission source at the facility, including exempt and trivial activities. The report shall also include all emission factors and other data used in calculating the monthly HAP emissions. The form "Truth, Accuracy & Completeness" is required.

NONCOMPLIANCE:

Any noncompliance with the HAP emission limit in this condition shall be reported by sending a copy of such

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



record to the NYSDEC Region 6 within 30 days of the occurrence.

Parameter Monitored: COATING LINES
Upper Permit Limit: 9,000 pounds per year
Reference Test Method: EPA Reference Method 18
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 3/1/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 4: Capping Monitoring Condition
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

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)
6 NYCRR 212-3.1 (a) (2)
6 NYCRR Subpart 231-1

Item 4.2:

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

Item 4.3:

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

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.

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



Item 4.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

CAP:

Facility owner shall ensure that emissions of Volatile Organic Compounds (VOC), including those from permitted, exempt, and trivial sources, remain less than 48,000 pounds during any consecutive 365 day period.

RECORDS:

Facility owner shall maintain records that verify the facility's monthly VOC emissions. These records must be maintained at the facility for a minimum five-year period.

REPORTS:

Reports will be submitted annually, in a format acceptable to the Commissioner's representative, which document that the facility's VOC emissions during any consecutive 365 day period had been less than 48,000 pounds. Each annual monitoring report must include information that documents the VOC emissions from each emission source at the facility, including exempt and trivial activities. The report must also include all emission factors and other data used in calculating the monthly VOC emissions. The form "Truth, Accuracy & Completeness" is required.

PERFORMANCE TESTING:

The Department is authorized to require stack testing at any time to verify VOC (or any other) emissions; in such an event, Reference Method 25A shall be utilized.

NONCOMPLIANCE:

Any noncompliance with the VOC 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: COATING LINES



New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065

Upper Permit Limit: 48,000 pounds per year
Reference Test Method: EPA Reference Method 25A
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 3/1/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 22: Visible Emissions Limited
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable Federal Requirement:6 NYCRR 211.2

Item 22.1:

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 23: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable Federal Requirement:6 NYCRR 211.2

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

- Regulated Contaminant(s):
- CAS No: 0NY998-00-0 VOC
- CAS No: 0NY100-00-0 TOTAL HAP
- CAS No: 0NY075-00-0 PARTICULATES

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:
1. Have a complaint phone line available 24 hours a day, 7 days a week; the employment of an answering machine is acceptable.
 2. Investigate any possible causes of any complaint received.
 3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
 4. Fully document the complaint, results of



New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065

investigation, and action taken.

5. Annually, report in a format acceptable to the Department. Facility shall report the number of complaints (even if zero) that have been logged throughout the reporting period.

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2019.

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

Condition 6: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

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

Item 6.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 3-COAT4 Emission Point: EPOV2

Emission Unit: 3-COAT4 Emission Point: EPOV4

Emission Unit: 3-COAT4 Emission Point: EPOV5

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

Item 6.2:

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 to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any process emission source subject to 6 NYCRR 201. Facility shall observe and evaluate the plume appearance weekly and then log these observations.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Observe plume weekly, do RM9 at DEC request

Monitoring Frequency: WEEKLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2019.

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

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



Condition 7: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

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

Item 7.1:

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

Emission Unit: 1-COAT2
Process: PN3

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP
CAS No: 0NY998-00-0 VOC

Item 7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

MONITORING PLAN FOR CAPTURE SYSTEM:
During any given month when Process PN3 will operate - to ensure 100% capture efficiency in the North Tower Room, the provisions of EPA Reference Method 204 (Permanent Total Enclosure) shall be maintained by following this monitoring procedure: Varflex shall monitor the average facial velocity through any RM204-qualified natural draft opening (NDO) of the North Tower Room. This velocity shall not fall below 200 ft/min while the RTO is operating. This measurement shall be made and logged once per month.

Parameter Monitored: AIR FLOW
Lower Permit Limit: 200 feet per minute
Reference Test Method: EPA Reference Method 204
Monitoring Frequency: MONTHLY
Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT
DURING STARTUP/SHUTDOWN
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 3/1/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 8: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable Federal Requirement:6 NYCRR 212-1.7 (b) (1)

Item 8.1:

The Compliance Demonstration activity will be performed for the facility:

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



The Compliance Demonstration applies to:

Emission Unit: 1-COAT2

Process: PN3

Emission Source: RTO#1

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

CAS No: 0NY998-00-0 VOC

Item 8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

OPERATING LIMITS:

The CMM regenerative thermal oxidizer (RTO) is required to be fitted with a continuous monitor that reads the combustion chamber temperature. The combustion chamber firing temperature shall not fall below 1,498 degrees F (three-hour block average) while coating operations are underway in the North Tower Room. Datalogger information shall be reduced to three-hour block averages.

BASIS:

This firing temperature is intended to perpetuate the firing parameters that prevailed during the most recent performance test on 10/21/2015. At that time, the RTO was fired at 1,498 degrees F, which yielded a DRE of 97.6%. The required minimum DRE is 90% per 6NYCRR 228-1.3(b)(1). Subsequent stack tests may establish lower firing temperatures provided that the DRE is 90% or greater.

NOTE:

In recognition that a coating day or a coating run is unlikely to be evenly divisible into three-hour runs (a 10 hour coating day could be 3 three-hour blocks plus one extra "orphaned" hour) a compensatory adjustment is agreed to by NYSDEC; a less than three-hour block average will suffice on the start and/or the finish of a given coating run or day. It is noted that this agreement will have implications in either a low temperature event or a bypass valve diversion event; a zero-DRE emission factor could persist for less than three hours.

SOURCE OF THIS REQUIREMENT:

The above regulatory content has been cloned from 40 CFR 63.4292(b) and also 6NYCRR 228-1.3(b)(1). The sole purpose of operating the RTO is to enable the usage of non-compliant coatings (coatings whose VOC-content exceeds

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



2.9 lbs/gal) in the North Tower Room.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1,498 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 3/1/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 9: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable Federal Requirement: 6 NYCRR 212-2.4 (a)

Item 9.1:

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

Emission Unit: 3-COAT4	Emission Point: EPOV2
Emission Unit: 3-COAT4	Emission Point: EPOV4
Emission Unit: 3-COAT4	Emission Point: EPOV5

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

Item 9.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particles are limited to less than 0.15 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions and on a dry gas basis.

In the absence of a formal stack test (EPA RM's 1 through 5), facility shall attest to compliance by visually monitoring and recording the exhaust plume from each involved emission point. These observations shall be recorded once per week in a log book which shall be submitted annually and shall be retained for a minimum five-year period.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.15 grains per 100 dscf
Reference Test Method: EPA Reference Methods 1 thru 5, if necessary
Monitoring Frequency: WEEKLY

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 3/1/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 10: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable Federal Requirement: 6 NYCRR 226.3 (a)

Item 10.1:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 10.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Requirements for Cold Cleaning Degreasers including
exempt and/or trivial units

A. Equipment Specifications when the internal volume of
the cold cleaner is greater than two gallons.

The following types of control equipment must be used when
conducting cold cleaning degreasing, solvent metal
cleaning:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if
practical.
- (3) A control system that limits VOC emissions to those
achievable with equipment having a freeboard ratio greater
than or equal to 0.5, or a water cover when the solvent is
insoluble in and heavier than water. This does not apply
to remote reservoir degreasers.
- (4) Solvent with a vapor pressure of 1.0 mm Hg, or less,
at 20 C.

B. Operating Requirements:

When cold cleaning, the clean parts must be drained at
least 15 seconds or until dripping ceases.

C. General Requirements:

A Person conducting solvent metal cleaning must:

- (1) Store solvent in covered containers and transfer or



dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.

(2) Maintain equipment to minimize leaks and fugitive emissions.

(3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.

(4) Keep the degreaser cover closed except when:

(a) parts are being placed into or being removed from the degreaser;

(b) adding or removing solvent from the degreaser;

(c) no solvent is in the degreaser; or

(d) when manually cleaning metal parts in the cold cleaning degreaser.

(5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.

(6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.

(7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.

(a) the name and address of the solvent supplier;

(b) the type of solvent including the product or vendor identification number; and

(c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

(8) Include in the Annual Monitoring Report the solvent consumption required under (5) above, as well as a statement that the permittee's obligations under items (1) through (7) above have been met for the period of the report. This statement must be based on the permittees observations on a daily basis that the operation of the solvent metal cleaning process has met the above criteria. The permittee must maintain a log of instances when the above have not been met, and such statement must summarize these instances.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2019.

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

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



Condition 11: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

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

Item 11.1:

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

Emission Unit: 1-COAT2 Emission Point: EP000

Emission Unit: 2-COAT2 Emission Point: EP001

Emission Unit: 2-COAT2 Emission Point: EP002

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

Item 11.2:

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, excepting only the emission of uncombined water, in this case - the emission points (stacks) for a coating operation. The permittee will conduct WEEKLY observations of visible emissions from the emission points to which this condition applies. The observations shall be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

The results of each observation 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?

Inclement weather that prohibits these observations should be noted as such. 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

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



immediately investigate any such occurrence and then take corrective action, as necessary, to reduce or eliminate those emissions. If visible emissions that exceed the normal continue to be present after process corrections are made, then the Permittee will immediately notify the Department and then 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 that is acceptable to the Department and the Annual Monitoring Report shall include a copy of this log.

**** 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
Reference Test Method: Observe plume weekly, do RM9 at NYSDEC request
Monitoring Frequency: WEEKLY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 3/1/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 12: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

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

Item 12.1:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 12.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:



Within all work areas that are associated with a coating line, the owner or operator of this facility (Varflex) subject to 6NYCRR Part 228 shall:

A) Use closed, non-leaking containers to store or dispose of cloth rags or other absorbent applicators (brushes, rollers, etc) that have been impregnated with VOC solvents that have used for surface preparation, cleanup or coating removal.

B) Store in closed, non-leaking containers, spent or fresh VOC solvents that are to be used for surface preparation, cleanup or coating removal.

C) Not use VOC solvents to cleanup spray equipment unless appropriate equipment is used to collect these cleaning compounds and to minimize VOC evaporation.

D) Not use open containers to store or dispense surface coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the 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.

All associated coating line work areas within the facility shall be inspected daily to verify adherence to items A thru E. One daily inspection per week shall be recorded in a log book; this log shall include the following information:

- 1) The date and time of that inspection
- 2) The areas or items that were observed
- 3) Corrective measures taken, when necessary

Monitoring Frequency: WEEKLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2019.

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

Condition 13: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

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

Item 13.1:



New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065

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

Emission Unit: 2-COAT2
Process: PS2

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

Item 13.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The use of coatings whose VOC-content exceeds 2.9 pounds
of VOC per gallon of coating less water and less exempt
VOC is prohibited for "fabric coating lines" unless a
control device (RTO) is utilized. See Part 228 Table D-1.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: EPA Reference Method 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED PER
OCCURRENCE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 3/1/2019.

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

Condition 14: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

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

Item 14.1:

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

Emission Unit: 1-COAT2
Process: PN3 Emission Source: RTO#1

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

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



Any VOC oxidizer that is used as a control device shall be designed and operated to provide at a minimum, an 90% overall removal efficiency (DRE). Varflex shall perform VOC destruction efficiency testing at least once during the ten-year term of this State Facility Permit. The NYSDEC is authorized to require additional stack testing at any time.

Parameter Monitored: VOC

Upper Permit Limit: 90 percent

Reference Test Method: EPA Reference Methods 204 & 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 15: Compliance Demonstration
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable Federal Requirement:6 NYCRR 228-1.6 (b)

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As Varflex formulates/manufactures it's own coatings onsite, the facility shall maintain records that are equivalent to MSDS and/or TDS sheets (deemed to be highly confidential). These records shall list all known hazardous ingredients, which would include any HAPs, VOCs and HTACs. These sheets shall indicate constituent percentages, VOC-content (for Part 228 Table D-1 applicability) and elutable VOC per unit of coating (for emissions calculations). Varflex has built these records into an Excel spreadsheet; NYSDEC has approved this spreadsheet in lieu of "manufacturer-supplied" MSDS and RM24/RM311. The Department reserves the right to reverse this approval and then to require RM24 lab testing or some other MSDS/TDS.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



**** Emission Unit Level ****

Condition 16: Emission Unit Permissible Emissions
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 16.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited

shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 2-COAT2

CAS No: 0NY998000 (From Mod 0)

Name: VOC

PTE(s): 16,440 pounds per year

1.88 pounds per hour

CAS No: 0NY100000 (From Mod 0)

Name: TOTAL HAP

PTE(s): 926 pounds per year

0.11 pounds per hour

Emission Unit: 4-COAT4

CAS No: 0NY998000 (From Mod 0)

Name: VOC

PTE(s): 0.0002 pounds per hour

1.87 pounds per year

CAS No: 0NY100000 (From Mod 0)

Name: TOTAL HAP

PTE(s): 0.0002 pounds per hour

1.87 pounds per year

Emission Unit: 3-COAT4

CAS No: 0NY998000 (From Mod 0)

Name: VOC

PTE(s): 0.93 pounds per hour

8,107 pounds per year

CAS No: 0NY100000 (From Mod 0)

Name: TOTAL HAP

PTE(s): 0.3 pounds per hour

2,671 pounds per year

Emission Unit: 1-COAT2

CAS No: 0NY998000 (From Mod 0)

Name: VOC

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



PTE(s): 1.41 pounds per hour

12,394 pounds per year

CAS No: 0NY100000 (From Mod 0)

Name: TOTAL HAP

PTE(s): 0.19 pounds per hour

1,691 pounds per year



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 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 17: Contaminant List
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable State Requirement:ECL 19-0301

Item 17.1:

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

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

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

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

Condition 18: Malfunctions and start-up/shutdown activities



Effective between the dates of 12/03/2018 and 12/02/2028

Applicable State Requirement:6 NYCRR 201-1.4

Item 18.1:

(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.

(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 19: Emission Unit Definition

Effective between the dates of 12/03/2018 and 12/02/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1(From Mod 0):

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

Emission Unit: 1-COAT2

Emission Unit Description:

This emission unit consists of the RTO-controlled web



coating operations which occur in the North Tower Room. This room utilizes one emission point, the exhaust stack for the RTO. Process PN3 is utilized in this emission unit. Coatings of any VOC-content may be applied in 1COAT2.

Building(s): North Room
Yard

Item 19.2(From Mod 0):

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

Emission Unit: 2-COAT2

Emission Unit Description:

The emission unit consists of the uncontrolled web coating operations which occur in the South Tower Room. This room utilizes two emission points (EP001 & EP002). Process PS2 may be utilized in this emission unit. Only coatings whose VOC-content is less than or equal to 2.9 lbs/gal may be applied in this emission unit.

Building(s): South Room

Item 19.3(From Mod 0):

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

Emission Unit: 3-COAT4

Emission Unit Description:

This emission unit consists of the coating and curing of non-web fabric "rods", which is performed in the Rod Room. Process PR3 is utilized in this emission unit. Emission unit 3-COAT4 does not utilize any sort of VOC/HAP control device. Coatings in 3COAT4 are hand-applied, so Part 228 (and VOC-content restrictions) does not apply.

Building(s): RodOvenRms

Item 19.4(From Mod 0):

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

Emission Unit: 4-COAT4

Emission Unit Description:

This emission unit consists of two distinct clean-up functions:
A) Two cold-cleaning degreasing units are used to wash impellers, shafts, etc that had been used in the Mix Room to blend coatings during the formulation process. The units are trivial per 6NYCRR201-3.3(c)(51) as each sink basin, when filled with regard for the "max fill line" badge, will not hold more than two gallons. The solvent used is xylene, which is permissible per 6NYCRR226.3(a).

B) The operation of one distillation unit in the Creel Room, known as process DIS. A coating residue & xylene



Condition 1-1: Compliance Demonstration
Effective between the dates of 01/16/2019 and 12/02/2028

Applicable State Requirement:6 NYCRR 201-5.4 (e)

Item 1-1.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Changes at a facility that meet all of the criteria listed below may not require a permit modification and may be conducted without the prior approval of the Department.

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.
3. Changes that do not seek to establish or modify a federally enforceable emission cap or limit.

The facility owner or operator must maintain records of the date and description of each such change for a period of at least five years. Records must be made available for review to Department representatives upon request, and must include the following information at a minimum:

1. Identification of the emission unit, process(es), emission source(s), and emission point(s) affected by the change;
2. The date on which the change occurred; and
3. A description of the change.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Air pollution prohibited
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable State Requirement:6 NYCRR 211.1

Item 5.1:

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



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 24: Emission Point Definition By Emission Unit
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1(From Mod 0):

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

Emission Unit: 1-COAT2

Emission Point: EP000

Height (ft.): 20

Diameter (in.): 28

NYTMN (km.): 4785.193 NYTME (km.): 462.288 Building: Yard

Item 24.2(From Mod 0):

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

Emission Unit: 2-COAT2

Emission Point: EP001

Height (ft.): 33

Diameter (in.): 12

NYTMN (km.): 4785.67 NYTME (km.): 462.294 Building: South Room

Emission Point: EP002

Height (ft.): 32

Diameter (in.): 14

NYTMN (km.): 4785.171 NYTME (km.): 492.292 Building: South Room

Item 24.3(From Mod 0):

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

Emission Unit: 3-COAT4

Emission Point: EPOV2

Height (ft.): 29

Diameter (in.): 10

NYTMN (km.): 4785.155 NYTME (km.): 462.275 Building: RodOvenRms

Emission Point: EPOV4

Height (ft.): 17

Diameter (in.): 8

NYTMN (km.): 4785.152 NYTME (km.): 462.278 Building: RodOvenRms

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



Emission Point: EPOV5
Height (ft.): 34 Diameter (in.): 10
NYTMN (km.): 4785.162 NYTME (km.): 462.276 Building: RodOvenRms

Condition 25: Process Definition By Emission Unit
Effective between the dates of 12/03/2018 and 12/02/2028

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1(From Mod 0):

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

Emission Unit: 1-COAT2
Process: PN3 Source Classification Code: 4-02-043-30

Process Description:

This process consists of the RTO-controlled web fabric coating and heat-curing operations that are performed in the North Tower Room. The coatings utilized could be either compliant or non-compliant with 6 NYCRR 228-1.4(d) Table D-1 (Fabric Coating Lines); but due to the utilization of a VOC control device (the RTO), 228-compliant coatings are not required in PN3.

Emission Source/Control: RTO#1 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: TOW04 - Process

Emission Source/Control: TOW05 - Process

Emission Source/Control: TOW07 - Process

Emission Source/Control: TOW08 - Process

Emission Source/Control: TOW09 - Process

Emission Source/Control: TOW10 - Process

Emission Source/Control: TOW11 - Process

Emission Source/Control: TOW12 - Process

Item 25.2(From Mod 0):

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

Emission Unit: 2-COAT2
Process: PS2 Source Classification Code: 4-02-043-30

Process Description:

This process consists of the uncontrolled web fabric coating and heat-curing operations that are performed in the South Tower Room. The coatings utilized are ALL

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



compliant with 6 NYCRR 228-1.4 Table D-1 (Fabric Coating Lines) as their VOC content is less than or equal to 2.9 lbs of VOC per gallon of coating less water and less exempt VOC.

Emission Source/Control: TOW01 - Process

Emission Source/Control: TOW02 - Process

Item 25.3(From Mod 0):

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

Emission Unit: 3-COAT4

Process: PR3

Source Classification Code: 4-02-043-30

Process Description:

This process consists of the coating and heat-curing of non-web braided-fabric sleeves, or "rods". Braided sleeves are coated by hand (with hand-held tools), these rods are then cured on racks in any of four natural gas-fired walk-in ovens. The coatings are manually-applied (with hand held tools - brushes and squeegees), therefore Part 228 does not apply to this process per 6 NYCRR 228-1.1(b)(2); hence, the 228-compliance of coatings is not required. When this process is referenced, all VOC and HAP content of those applied coatings shall be reported as fugitive emissions and then added to facility totals.

Emission Source/Control: JIG#1 - Process

Emission Source/Control: JIG#2 - Process

Emission Source/Control: OVEN2 - Process
Design Capacity: 0.75 million BTUs per hour

Emission Source/Control: OVEN4 - Process
Design Capacity: 0.75 million BTUs per hour

Emission Source/Control: OVEN5 - Process
Design Capacity: 0.75 million BTUs per hour

Item 25.4(From Mod 0):

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

Emission Unit: 4-COAT4

Process: DIS

Source Classification Code: 4-02-999-99

Process Description:

This process consists of a solvent (xylene) recovery distillation unit. Tower clean-up liquid wastes and Mix Room mixing equipment clean-up liquid wastes are processed in this still to separate reusable xylene from unwanted still bottoms. This process may exhaust fugitives into the room airspace and therefore this process has no emission

New York State Department of Environmental Conservation

Permit ID: 6-3013-00065/00017

Facility DEC ID: 6301300065



point. When this process is referenced, the calculated (mass balance) VOC and HAP still emissions shall be added to the facility total.

Emission Source/Control: STILL - Process