

Facility DEC ID: 9041200031

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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-0412-00031/02001  
Effective Date: 09/13/2010 Expiration Date: 09/12/2020

Permit Issued To: ELANTAS PDG INC  
5200 N SECOND ST  
ST. LOUIS, MO 63417

Contact: KENNETH R MAY  
CYTEC OLEAN INC  
1405 BUFFALO ST  
OLEAN, NY 14760

Facility: ELANTAS PDG INC  
1405 BUFFALO ST  
OLEAN, NY 14760

Description:

Cytec Olean Inc. manufactures polyurethanes, epoxy products, adhesives and solvent borne primers and coatings in batch reactors. These products are then used by customers to coat, cast, or encapsulate their products. Cytec also owns an engineered parts division that develops and manufactures military equipment, ATM belts and squeegees.

This permit action is required to change the existing Air Facility Registration to an Air State Facility Permit. Details regarding the permit are as follows:

- The permit contains a total hazardous air pollutant (HAP) and an individual HAP emission limit of 45,000 pounds per year (lbs/yr) and 18,000 lbs/yr, respectively. By restricting the potential to emit of these contaminants, the facility is not subject to 6NYCRR Part 201-6, Title V permitting. The facility is required to maintain actual monthly emission estimates to verify compliance with the emission limits.
- An air quality impact and dispersion modeling analysis was conducted to evaluate ambient impacts of air emissions from the facility. The resulting concentrations predicted for all but two (2) modeled contaminants were found to be less than the respective individual compound short term guidance concentrations (SGCs) and annual guidance concentrations (AGCs) from NYSDEC's DAR-1 guidelines.
- Without operating restrictions, the two contaminants exceeding the SGCs and AGCs include 2,4- and 2,6-toluene diisocyanate (TDI) also cited in the permit as a total of the two compounds as Benzene, 1,3-diisocyanatomethyl (cas # 026471-62-5).

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- The permit includes restrictions on the annual and short term TDI emissions to ensure potential impacts do not exceed the SGCs and AGCs.
- An annual limit of 92 pounds per year of TDI emissions is based on actual monthly and rolling 12-month emission calculations.
- A short term limit of 0.1179 pounds per hour TDI (the sum total of all unrestricted and restricted TDI emissions), is based on the Emission Master calculation methodology. This short term limit will be validated through a performance test of vent stacks for TDI offloading and worst case reactor emissions (i.e., the aggregate emissions from all unrestricted emission points and emissions from scenario 4, EP#96). On-going compliance monitoring of the short term limit is based on operating scenarios presented in Table 1 of the permit application and summarized below:

Unrestricted Emission Points with no simultaneous operational limitations

Name	EP ID	Max Hourly (lbs/hr)	Max Annual (lbs/yr)
APC suncore vent arm	23	2.77E-04	0.806
Vacuum Pump	24	4.08E-03	22.317
Westinghouse mold	26	2.20E-05	0.064
Hood Vent	37	8.70E-05	0.253
Compounding Vents	49	7.21E-03	4.269
Vent Blower	76	6.18E-03	2.366
Cleaning Table- Squeegee Oven	79	2.00E-08	0.000
TDI Storage Building Vent	82	1.00E-02	0.100
Mandrel lathe vent	102	3.80E-05	0.111
Hood Vent	103	2.25E-04	0.655

Allowable Simultaneous Operations: lbs/hr

Scenario	EP 20	EP71	EP 78	EP 96
1	0.0544	0	0	0
2	0	0.0449	0	0
3	0	0	0.0449	0
4	0	0	0	0.0898
5	0.0272	0.0449	0	0
6	0.0272	0	0	0.0449
7	0	0.0449	0.0449	0
8	0	0.0449	0	0.0449
9	0	0	0.0449	0.0449

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If storage vent not emitting:				
10	0.0544	0.0449	0	0
11	0.0544	0	0	0.0449

Allowable Simultaneous Operations: number of reactors

Scenario	EP 20	EP 71	EP 78	EP 96
Number of reactors to indicated vent				
1	2	0	0	0
2	0	1	0	0
3	0	0	1	0
4	0	0	0	2
5	1	1	0	0
6	1	0	0	1
7	0	1	1	0
8	0	1	0	1
9	0	0	1	1
If TDI Storage vent is not emitting, then:				
10	2	1	0	0
11	2	0	0	1

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: DAVID S DENK  
 DIVISION OF ENVIRONMENTAL PERMITS  
 270 MICHIGAN AVE  
 BUFFALO, NY 14203-2915

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

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**Notification of Other State Permittee Obligations**

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

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**PAGE LOCATION OF CONDITIONS**

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**DEC GENERAL CONDITIONS**

**General Provisions**

- 4 1 Facility Inspection by the Department
- 4 2 Relationship of this Permit to Other Department Orders and Determinations
- 4 3 Applications for permit renewals, modifications and transfers
- 5 4 Permit modifications, suspensions or revocations by the Department

**Facility Level**

- 5 5 Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

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

**Condition 1: Facility Inspection by the Department**  
**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**  
**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

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

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

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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

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

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2915  
(716) 851-7165

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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: ELANTAS PDG INC  
5200 N SECOND ST  
ST. LOUIS, MO 63417

Facility: ELANTAS PDG INC  
1405 BUFFALO ST  
OLEAN, NY 14760

Authorized Activity By Standard Industrial Classification Code:  
2821 - PLASTICS MATERIALS AND RESINS

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**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 6 1 40 CFR Part 68: Accidental release provisions.
- 6 2 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 7 3 6 NYCRR 201-7.2: Facility Permissible Emissions
- 8 \*4 6 NYCRR 201-7.2: Capping Monitoring Condition
- 9 \*5 6 NYCRR 201-7.2: Capping Monitoring Condition
- 12 \*6 6 NYCRR 201-7.2: Capping Monitoring Condition
- 14 \*7 6 NYCRR 201-7.2: Capping Monitoring Condition
- 15 \*8 6 NYCRR 201-7.2: Capping Monitoring Condition
- 17 20 6 NYCRR 211.2: Air pollution prohibited
- 17 9 6 NYCRR 212.4 (c): Compliance Demonstration
- 18 10 6 NYCRR 212.6 (a): Compliance Demonstration
- 19 11 6 NYCRR 225-1.2 (d): Compliance Demonstration
- 20 12 6 NYCRR 227-1.3: Compliance Demonstration

**Emission Unit Level**

**EU=U-GNMFG,Proc=FTR**

- 21 13 6 NYCRR 212.4 (a): Compliance Demonstration

**EU=U-PWASH**

- 23 14 6 NYCRR Part 226: Compliance Demonstration
- 25 15 6 NYCRR 226.3 (a) (4): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 27 16 ECL 19-0301: Contaminant List
- 28 17 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 29 18 6 NYCRR Subpart 201-5: Emission Unit Definition
- 29 19 6 NYCRR 201-5.4 (b): Compliance Demonstration

**Emission Unit Level**

- 33 21 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 35 22 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.

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**FEDERALLY ENFORCEABLE CONDITIONS**

FINAL

\*\*\*\* 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,

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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**

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**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)**

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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: Accidental release provisions.**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

**Applicable Federal Requirement:40 CFR Part 68**

**Item 1.1:**

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

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
  - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
  - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

**Condition 2: Non Applicable requirements**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

**Applicable Federal Requirement:6 NYCRR 201-6.5 (g)**

**Item 2.1:**

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

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any such requirements as non-applicable.

40 CFR Part 60, Subpart VV

Reason: Cytec reports they are not subject to 40 CFR 60 Subpart VV - Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry because they do not produce, as intermediates or final products, one or more of the chemicals listed in §60.489 including Toluene-2,4-diisocyanate (CAS # 584-84-9) and Toluene diisocyanates (mixture) (CAS# 26471-62-5).

40 CFR 63.11416 (b)

Reason: Cytec reports they are not subject to 40 CFR 63 Subpart OOOOOO - Flexible Polyurethane Foam Production and Fabrication (area sources) NESHAP because they do not own or operate a plant that produces flexible polyurethane foam. Flexible polyurethane foam means a flexible cellular polymer containing urea and carbamate linkages in the chain backbone produced by reacting a diisocyanate, polyol, and water. Flexible polyurethane foams are open-celled, permit the passage of air through the foam, and possess the strength and flexibility to allow repeated distortion or compression under stress with essentially complete recovery upon removal of the stress.

40 CFR Part 64

Emission Unit: UGNMFG Process: FTR

Reason: Pre-control emissions from process FTR are less than the major source thresholds for all criteria pollutants, as such, Compliance Assurance Monitoring (CAM) is not applicable to any potential control devices that may be used in this process.

**Condition 3: Facility Permissible Emissions**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 3.1:**

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

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

CAS No: 026471-62-5 PTE: 92 pounds per year  
Name: BENZENE, 1,3-DIISOCYANATOMETHYL

CAS No: 0NY100-00-0 PTE: 45,000 pounds per year  
Name: TOTAL HAP

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**Condition 4: Capping Monitoring Condition**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 4.1:**

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

6 NYCRR 212.4 (a)

**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.

**Item 4.6:**

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

Emission Unit: U-ENPTS

Emission Unit: U-GNMFG

Regulated Contaminant(s):

CAS No: 026471-62-5      BENZENE, 1,3-DIISOCYANATOMETHYL

**Item 4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

1. Based on the impact modeling analysis, Cytec shall be limited to a total hourly emission rate of 0.1179 lbs/hr TDI.
2. The total hourly emission rate is based on the following emission estimates: (1) the unrestricted tank vent emissions from EP# 82 estimated at a maximum rate of 0.01 lbs/hr TDI, (2) the worst case reactor emissions estimated from EP# 96 at a rate of 0.0898 lbs/hr TDI, and (3) the remaining unrestricted TDI emissions from EP# 23, 24, 26, 37, 49, 76, 79, 102, 103 at a combined rate of 0.02 lbs/hr TDI. The sum of the aggregate unrestricted emission sources and the maximum restricted emissions equates to 0.1179 lbs/hr TDI, which is the maximum expected short term or hourly emission rate from the facility.
3. Cytec must complete a performance test of tank vent stacks for TDI offloading and worst case reactor emissions for the restricted TDI operating scenario to validate the Emission Master Calculation methodology and demonstrate compliance with the short term TDI impact limits for those TDI restricted sources.
4. A stack test protocol must be submitted within 90 days of issuance of this permit. The testing shall be completed within 60 days of department approval of the protocol and a final test report shall be submitted within 60 days after the testing is complete. The Department must be notified 10 days prior to the scheduled test date so a Department representative may be present during the test.

Parameter Monitored: BENZENE, 1,3-DIISOCYANATOMETHYL

Upper Permit Limit: 0.1179 pounds per hour

Reference Test Method: approved method

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 5: Capping Monitoring Condition****Effective between the dates of 09/13/2010 and 09/12/2020****Applicable Federal Requirement: 6 NYCRR 201-7.2****Item 5.1:**

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



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otherwise be subject to:

6 NYCRR 212.9 (b)

**Item 5.2:**

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

**Item 5.3:**

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

**Item 5.4:**

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

**Item 5.5:**

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

**Item 5.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 026471-62-5 BENZENE, 1,3-DIISOCYANATOMETHYL

**Item 5.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

On-going compliance monitoring of the hourly TDI emission limits is completed through production operating restrictions.

Cytec shall limit production operating conditions to those described in Table 1 of the permit application, dated September 2009. These operating conditions are summarized as follows and are also presented in the facility description of this permit.

Unrestricted Emission Points with no simultaneous operational limits:

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EP#23, APC suncore vent, max hourly=2.77E-04 lbs/hr  
 TDI  
 EP#24, Vacuum pump, max hourly=4.08E-03 lbs/hr TDI  
 EP#26, Westinghouse mold, max hourly=2.20E-05 lbs/hr  
 TDI  
 EP#37, Hood vent, max hourly=8.70E-05 lbs/hr TDI  
 EP#49, Compounding vents, max hourly=7.21E-03 lbs/hr  
 TDI  
 EP#76, Vent blower, max hourly=6.18E-03 lbs/hr TDI  
 EP#79, Cleaning table, max hourly=2.00E-08 lbs/hr  
 TDI  
 EP#82, TDI storage, max hourly=1.00E-02 lbs/hr  
 TDI  
 EP#102, Mandrel lathe, max hourly=3.80E-05 lbs/hr  
 TDI  
 EP#103, Hood vent, max hourly=2.25E-04 lbs/hr  
 TDI

Allowable Simultaneous Operations: lbs/hr TDI  
 Scenario 1, EP#20, max hourly=0.0544  
 Scenario 2, EP#71, max hourly=0.0449  
 Scenario 3, EP#78, max hourly=0.0449  
 Scenario 4, EP#96, max hourly=0.0898  
 Scenario 5, EP#20 and #71, max hourly=0.0272 and  
 0.0449  
 Scenario 6, EP#20 and #96, max hourly=0.0272 and  
 0.0449  
 Scenario 7, EP#71 and #78, max hourly=0.0449 and  
 0.0449  
 Scenario 8, EP#71 and #96, max hourly=0.0449 and  
 0.0449  
 Scenario 9, EP#78 and #96, max hourly=0.0449 and  
 0.0449  
 If TDI storage vent not emitting:  
 Scenario 10, EP#20 and #71, max hourly=0.0544 and  
 0.0449  
 Scenario 11, EP#20 and #96, max hourly=0.0544 and  
 0.0449

Allowable Simultaneous Operations: number of  
 reactors  
 Scenario 1, EP#20, 2 reactors  
 Scenario 2, EP#71, 1 reactor  
 Scenario 3, EP#78, 1 reactor  
 Scenario 4, EP#96, 2 reactors  
 Scenario 5, EP#20 and 71, 1 reactor each  
 Scenario 6, EP#20 and #96, 1 reactor each  
 Scenario 7, EP#71 and #78, 1 reactor each  
 Scenario 8, EP#71 and #96, 1 reactor each  
 Scenario 9, EP#78 and #96, 1 reactor each  
 If TDI storage vent not emitting:  
 Scenario 10, EP#20 with 2 reactors and EP#71 with 1

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reactor  
Scenario 11, EP#20 with 2 reactors and EP#96 with 1  
reactor

Consistent with Table 1, Cytec may operate those emission points dedicated unrestricted simultaneously with any one of operating scenarios 1 through 11. At no time will more than one scenario (1 - 11) be run concurrently. By limiting TDI scenarios in this manner, Cytec will assure that it maintains maximum concurrent TDI emissions at or below the emission rates modeled in the ERM modeling report dated 9/23/2009, which demonstrates acceptable off-site TDI ambient air concentrations. Cytec shall maintain operational records demonstrating conformance with Table 1. These records must be available for NYSDEC inspection upon request.

Note: The TDI storage tank vent emits TDI only when it is being filled. During general manufacturing operations, the storage tank vent does not emit TDI.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL  
CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED PER  
OCCURRENCE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

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

**Condition 6: Capping Monitoring Condition**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 6.1:**

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

6 NYCRR 212.9 (b)

**Item 6.2:**

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

**Item 6.3:**

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

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other state and federal air pollution control requirements, regulations or law.

**Item 6.4:**

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

**Item 6.5:**

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

**Item 6.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
 CAS No: 026471-62-5      BENZENE, 1,3-DIISOCYANATOMETHYL

**Item 6.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Based on the impact modeling analysis, total TDI (2,4 and 2,6) annual facility emission rates shall not exceed 92 lbs/yr on a 12 month rolling basis. In addition, the total TDI emissions shall be limited by emission point on a 12 month rolling total basis as follows:

- EP # 20 and 139 total shall be less than 11.750 lbs/yr of TDI
- EP # 71 shall be less than 16.755 lbs/yr of TDI
- EP # 78 shall be less than 7.370 lbs/yr of TDI
- EP # 96 shall be less than 25.307 lbs/yr of TDI
- EP # 23, 24, 26, 37, 49, 76, 79, 82, 102, and 103 total emissions shall be less than 30.941 lbs/yr TDI

The facility shall demonstrate compliance by calculating actual monthly emissions and recording 12-month rolling total TDI emissions by emission point. TDI emission calculations shall be maintained on-site and be available for NYSDEC inspection upon request. The following formula provides a general approach to the actual emission tracking system:

General Formula - number of batches per month x product

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family or product specific emission factor per batch.

Parameter Monitored: BENZENE, 1,3-DIISOCYANATOMETHYL

Upper Permit Limit: 92 pounds per year

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

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

**Condition 7: Capping Monitoring Condition**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 7.1:**

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

6 NYCRR Subpart 201-6

**Item 7.2:**

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

**Item 7.3:**

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

**Item 7.4:**

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

**Item 7.5:**

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

**Item 7.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 7.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility-wide aggregate HAP emissions shall not exceed 22.5 tons per year total aggregate HAPS on a 12 month rolling total basis. The facility shall demonstrate compliance by calculating actual monthly emissions and recording 12-month rolling total aggregate HAP emissions using spreadsheets. HAP emission calculations shall be maintained on-site and be available for NYSDEC inspection upon request. The following formula provides a general approach to the actual emission tracking system:

General Formula - number of batches per month x product family or product specific emission factor per batch.

Parameter Monitored: TOTAL HAP  
 Upper Permit Limit: 45000 pounds per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2011.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 8: Capping Monitoring Condition**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 8.1:**

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

6 NYCRR Subpart 201-6

**Item 8.2:**

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

**Item 8.3:**

The owner or operator of the permitted facility must maintain all required records on-site for a

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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 8.4:**

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 8.5:**

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 8.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 8.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility-wide individual HAP emissions shall not exceed 9 tons per year individual HAP on a 12 month rolling total basis. The facility shall demonstrate compliance by calculating actual monthly emissions and recording 12-month rolling total individual HAP emissions using spreadsheets. HAP emission calculations shall be maintained on-site and be available for NYSDEC inspection upon request. The following formula provides a general approach to the actual emission tracking system:

General Formula - number of batches per month x product family or product specific emission factor per batch.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2011.

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

**Condition 20: Air pollution prohibited**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 20.1:**

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 9: Compliance Demonstration**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 9.1:**

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

Emission Unit: U-ENPTS

Emission Unit: U-GNMFG

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:

In instances where determination of permissible emission rate using process weight is not applicable and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications upon request by the department. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control



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equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

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

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

Parameter Monitored: PARTICULATES  
 Upper Permit Limit: 0.05 grains per dscf  
 Reference Test Method: EPA Method 5  
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
 Averaging Method: 1-HOUR AVERAGE  
 Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 10.1:**

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

Emission Unit: U-ENPTS

Emission Unit: U-GNMFG

Emission Unit: U-PWASH

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

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**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies upon request by the department while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with section 212.6(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify The Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 11: Compliance Demonstration**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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**Applicable Federal Requirement:6 NYCRR 225-1.2 (d)**

**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The sulfur content of the fuel oil burned at the facility shall not exceed 1.5% by weight per 6 NYCRR Part 225-1.2(d), Table 2.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: OIL (NOT ELSEWHERE CLASSIFIED)

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 12: Compliance Demonstration**

**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 12.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operators of oil-fired boilers which are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

1) Observe the stack for each boiler which is operating on oil once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

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2) 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 conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days firing oil (the firing of other fuels in between days of firing oil does not count as an interruption in the consecutive days of firing oil), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence.

The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**\*\* 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.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 13: Compliance Demonstration**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

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**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-GNMFG

Process: FTR

Regulated Contaminant(s):

CAS No: 026471-62-5 BENZENE, 1,3-DIISOCYANATOMETHYL

**Item 13.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Under this alternate operating scenario, Cytec proposes to reduce TDI emissions such that the impact of emissions is equivalent to or less than the existing TDI emissions. If Cytec chooses to use this alternate operating scenario, the following documents shall be submitted to NYSDEC for review at least 30 days in advance of implementing any alternate operating. Specifically, Cytec shall:

1. Identify the approach used to achieve emission reductions which may include, but not be limited to process changes, stack configuration and building modifications, or refinement of emission estimating techniques. The addition of emission control equipment would not be allowed under this scenario as this is considered a modification and requires a permit action;
2. Demonstrate through dispersion modeling that the alternate operating scenario will limit off-site concentrations of TDI compounds such that the impact is equivalent to or less than the existing TDI emissions and less than the TDI AGC and SGC guidance values;
3. Identify any changes to the existing TDI permit emission limits, compliance monitoring, recordkeeping and reporting methods; and
4. Commit to performance testing (if applicable).

Following NYSDEC's review and approval, Cytec shall be permitted to implement the proposed alternate emission management approach.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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**Condition 14: Compliance Demonstration**

Effective between the dates of 09/13/2010 and 09/12/2020

**Applicable Federal Requirement: 6 NYCRR Part 226****Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PWASH

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

§226.2 General requirements

A person conducting solvent metal cleaning must:

- (a) 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;
- (b) maintain equipment to minimize leaks and fugitive emissions;
- (c) display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs;
- (d) keep the degreaser cover closed except when parts are being placed into or being removed from the degreaser, the cover needs to be open in order to add or remove solvent from the degreaser, no solvent is in the degreaser, or manually cleaning metal parts in a cold cleaning degreaser;
- (e) create and retain a record of solvent consumption for five years. This record must be made available to the department upon request;
- (f) not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser; and
- (g) if using a cold cleaning degreaser that is subject to section 226.3(a)(4) of this Part, 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:
  - (1) the name and address of the solvent supplier;

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- (2) the type of solvent including the product or vendor identification number; and
- (3) the vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

#### §226.3 Equipment specifications

Except as otherwise permitted by the department pursuant to section 226.5 of this Part, the following types of control equipment must be used by a person conducting solvent metal cleaning:

- (a) Cold cleaning degreasing when the internal volume of the machine is greater than two gallons.
  - (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. Remote reservoir degreasers are exempt from this requirement.
  - (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20°C. Prior to January 1, 2004, compliance with this requirement is not mandatory if compliant solvents are not readily available. On or after January 1, 2004, the person conducting solvent metal cleaning covered by this subdivision must use compliant solvents or have submitted a process specific RACT demonstration pursuant to section 226.5 of this Part. This paragraph does not apply to degreasers:
    - (i) used in special and extreme solvent metal cleaning;
    - (ii) for which the owner or operator has received department approval of a demonstration that compliance with the requirement of a solvent with a vapor pressure of 1.0 mm Hg, or less, at 20°C will result in unsafe operating conditions; or
    - (iii) that are located in a permanent total enclosure having control equipment that is designed and operated with an overall VOC removal efficiency of 90 percent or greater.

#### §226.4 Operating requirements

Except as otherwise allowed by the department pursuant to section 226.5 of this Part, the following operating practices are required by a person conducting solvent metal cleaning:

- (a) Cold cleaning degreasing. Clean parts shall be drained at least 15 seconds or until dripping ceases.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 15: Compliance Demonstration**  
Effective between the dates of 09/13/2010 and 09/12/2020

**Applicable Federal Requirement: 6 NYCRR 226.3 (a) (4)**

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PWASH

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Cytec uses compliant solvents in the parts washers throughout the facility and understands its obligation to submit a process specific RACT demonstration if the facility chooses to use a solvent with a vapor pressure greater than 1.0 mm Hg.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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**STATE ONLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

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

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

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

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

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department

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will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Item 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 16: Contaminant List**

**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 16.1:**

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

CAS No: 007446-09-5  
Name: SULFUR DIOXIDE

CAS No: 026471-62-5  
Name: BENZENE, 1,3-DIISOCYANATOMETHYL

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

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

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

**Condition 17: Unavoidable noncompliance and violations**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 17.1:**

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

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

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

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

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

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

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

**Condition 18: Emission Unit Definition**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 18.1:**

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

Emission Unit: U-ENPTS

Emission Unit Description:

Emission unit U-ENPTS consists of processes, sources and emission points associated with the engineered parts division.

Building(s): MFG

**Item 18.2:**

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

Emission Unit: U-GNMFG

Emission Unit Description:

Emission unit U-GNMFG includes processes, sources and emission points used for general manufacturing of epoxy Part A's and B's, Urethanes Part A's and B's, TDI prepolymers, solvent borne primers and coatings, GMR-8020, TDI storage tank emissions and also includes emission sources involved in cleaning operations and solvent recovery.

Building(s): MFG

**Item 18.3:**

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

Emission Unit: U-PWASH

Emission Unit Description:

Emission unit U-PWASH consists of the parts washers and associated emission points throughout the facility.

Building(s): MFG

**Condition 19: Compliance Demonstration**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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**Applicable State Requirement: 6 NYCRR 201-5.4 (b)**

**Item 19.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 19.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Generic Operational Flexibility  
Condition

Operational Flexibility Plan

I. Protocol Objective

The objective of this condition is to maximize operational flexibility at the facility by building into the Title V Permit the capability to make certain changes using a protocol. As provided under 6 NYCRR Part 201-6.5(f)(2), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.7.

II. Protocol

A. Criteria

1. Changes reviewed under this protocol in shall be evaluated in accordance with the following criteria:

a. All underlying federal and state requirements with which the new or changed emission source must comply must exist in the Title V permit. Existing permit conditions may be amended to reference or include the new or changed emission source and any related information, and/or, subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.

b. Any new or changed emission source shall not be part of a source project that results in a significant net emissions

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increase that exceeds the NSR thresholds identified in 6 NYCRR Part 231-2 or 40 CFR 52.21

c. The facility shall not use the protocol to make physical changes or changes in the method of operation of existing emission sources that would require a new or modified federally enforceable cap either to avoid major New Source Review requirements or to address and comply with other Clean Air Act requirements such as RACT. Such changes must be addressed via the significant permit modification provisions.

**B. Notification Requirements for Changes Reviewed under Protocol**

1. The facility shall notify the Department in writing of the proposed change.

2. Notifications made in accordance with this protocol will include the following documentation:

a. Identification of the Title V permit emission unit, process(es), emission sources, and emission points affected by the proposed change with applicable revisions to the Emission Unit structure;

b. Description of the proposed change, including operating parameters;

c. Identification and description of emissions control technology;

d. Documentation of the project's or emission source's compliance with respect to all state and/or federally applicable requirements, including the following steps:

i. Calculate the emission rate potential and maximum projected actual annual emission rates for all contaminants affected by the change.

ii. Submit documentation of major NSR program

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non-applicability for NYSDEC  
review and approval.

iii. Identify and evaluate the applicability of all  
regulations likely  
to be triggered by the new or changed emission source.

iv. Propose any operating and record keeping procedures  
necessary to  
ensure compliance.

e. Any other relevant information used for the evaluation  
of the  
proposed project or emission source under the Protocol.

#### C. Review and Approval of Changes

1. The Department shall respond to the permittee in  
writing with a  
determination within 15 days of receipt of the  
notification from the permittee.

2. The Department may require a permit modification, in  
order to  
impose new applicable requirements or additional permit  
conditions if  
it determines that changes proposed pursuant to  
notification do not  
meet the criteria under III.A or that the change may have a  
significant air quality impact or be otherwise potentially  
significant  
under SEQRA (6NYCRR Part 617).

3. The Department may require that the permittee not  
undertake the  
proposed change until it completes a more detailed review  
of the  
proposed change, which may include potential air quality  
impacts  
and/or applicable requirements. The Department's  
determination shall  
include a listing of information required for further  
review, if  
necessary.

D. Additional Compliance Obligations for Changes Made  
Under this  
Protocol

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1. Upon commencement of the change, the facility shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with III.A.1.a above.

2. The facility shall provide with the semi-annual monitoring report, a summary of the changes made in accordance with this protocol and a statement of the compliance status of each. Changes reported should include all those made during the corresponding period and any earlier changes that have not yet been incorporated into the permit.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

**Condition 21: Emission Point Definition By Emission Unit**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 21.1:**

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

Emission Unit: U-ENPTS

Emission Point: EP023	Height (ft.): 34	Diameter (in.): 15	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP024	Height (ft.): 24	Diameter (in.): 2	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP026	Height (ft.): 34	Diameter (in.): 14	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP031	Height (ft.): 33	Diameter (in.): 6	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP034	Height (ft.): 37	Diameter (in.): 24	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG



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Emission Point: EP079	Height (ft.): 44	Diameter (in.): 4	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP087	Height (ft.): 34	Diameter (in.): 14	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP102	Height (ft.): 34	Diameter (in.): 60	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP103	Height (ft.): 24	Diameter (in.): 36	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP106	Height (ft.): 35	Diameter (in.): 17	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP155	Height (ft.): 23	Diameter (in.): 18	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP158	Height (ft.): 23	Diameter (in.): 24	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG

**Item 21.2:**

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

Emission Unit: U-GNMFG			
Emission Point: EP020	Height (ft.): 54	Diameter (in.): 4	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP049	Height (ft.): 60	Length (in.): 32	Width (in.): 24
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP051	Height (ft.): 56	Diameter (in.): 12	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP068	Height (ft.): 61	Diameter (in.): 18	
	NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP071	Height (ft.): 50	Diameter (in.): 19	

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NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP074		
Height (ft.): 50	Diameter (in.): 2	
NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP076		
Height (ft.): 49	Diameter (in.): 15	
NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP078		
Height (ft.): 50	Diameter (in.): 22	
NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP082		
Height (ft.): 32	Diameter (in.): 2	
NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP084		
Height (ft.): 61	Diameter (in.): 19	
NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP096		
Height (ft.): 60	Length (in.): 18	Width (in.): 16
NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP120		
Height (ft.): 51	Diameter (in.): 12	
NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG
Emission Point: EP139		
Height (ft.): 54	Diameter (in.): 4	
NYTMN (km.): 4664.9	NYTME (km.): 214.9	Building: MFG

**Condition 22: Process Definition By Emission Unit**  
**Effective between the dates of 09/13/2010 and 09/12/2020**

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

**Item 22.1:**

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

Emission Unit: U-ENPTS  
 Process: BLT  
 Process Description:  
 Process BLT includes sources and emission points associated with belt production.

Emission Source/Control: EN102 - Process

Emission Source/Control: EN103 - Process

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**Item 22.2:**

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

Emission Unit: U-ENPTS  
 Process: PAD  
 Process Description:  
     Process PAD includes sources and emission points associated with pad production.

Emission Source/Control: EN023 - Process

Emission Source/Control: EN024 - Process

Emission Source/Control: EN026 - Process

Emission Source/Control: EN034 - Process

Emission Source/Control: EN087 - Process

Emission Source/Control: EN155 - Process

Emission Source/Control: EN158 - Process

**Item 22.3:**

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

Emission Unit: U-ENPTS  
 Process: SQG  
 Process Description:  
     Process SQG includes sources and emission points associated with squeegee production and other small engineered parts.

Emission Source/Control: SQG01 - Process

**Item 22.4:**

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

Emission Unit: U-GNMFG  
 Process: FTR  
 Process Description:  
     Process FTR is an alternate operating scenario for equipment listed in process ID TDI. It enables the use of an emissions management strategy as a means of limiting potential off-site ambient air concentrations of TDI compounds in accordance with NYSDEC's DAR-1 requirements. This process is mutually exclusive from permit process TDI (i.e., it will not operate at the same time). This process ID restricts TDI emissions to concentrations that do not exceed the TDI SGC of 14 ug/m<sup>3</sup> or AGC of 0.07 ug/m<sup>3</sup>.

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Emission Source/Control: RX006 - Process  
Design Capacity: 450 gallons

Emission Source/Control: RX009 - Process  
Design Capacity: 270 gallons

Emission Source/Control: RX010 - Process  
Design Capacity: 1,250 gallons

Emission Source/Control: RX013 - Process  
Design Capacity: 65 gallons

Emission Source/Control: RX015 - Process  
Design Capacity: 2,150 gallons

Emission Source/Control: RX019 - Process  
Design Capacity: 250 gallons

**Item 22.5:**

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

Emission Unit: U-GNMFG

Process: GEN

Process Description:

Process GEN includes sources and emission points used during general manufacturing processes.

Emission Source/Control: DISPR - Process  
Design Capacity: 340 gallons

Emission Source/Control: FLMPK - Process  
Design Capacity: 3,745 gallons

Emission Source/Control: NFLPK - Process  
Design Capacity: 1,485 gallons

Emission Source/Control: RX002 - Process  
Design Capacity: 3,200 gallons

Emission Source/Control: RX003 - Process  
Design Capacity: 640 gallons

Emission Source/Control: RX004 - Process  
Design Capacity: 450 gallons

Emission Source/Control: RX005 - Process  
Design Capacity: 450 gallons

Emission Source/Control: RX006 - Process  
Design Capacity: 450 gallons

Emission Source/Control: RX008 - Process

Permit ID: 9-0412-00031/02001

Facility DEC ID: 9041200031

Design Capacity: 450 gallons

Emission Source/Control: RX009 - Process  
Design Capacity: 270 gallons

Emission Source/Control: RX010 - Process  
Design Capacity: 1,250 gallons

Emission Source/Control: RX011 - Process  
Design Capacity: 25 gallons

Emission Source/Control: RX012 - Process  
Design Capacity: 25 gallons

Emission Source/Control: RX013 - Process  
Design Capacity: 65 gallons

Emission Source/Control: RX014 - Process  
Design Capacity: 1,250 gallons

Emission Source/Control: RX015 - Process  
Design Capacity: 2,150 gallons

Emission Source/Control: RX017 - Process  
Design Capacity: 3,500 gallons

Emission Source/Control: RX018 - Process  
Design Capacity: 475 gallons

Emission Source/Control: RX019 - Process  
Design Capacity: 250 gallons

**Item 22.6:**

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

Emission Unit: U-GNMFG

Process: TDI

Process Description:

Process TDI includes sources and emission points manufacturing products that contain TDI as a raw material.

This process will be mutually exclusive from permit process ID FTR (i.e., it will not operate at the same time). The scenarios identified in the compliance certification section for this process ID restrict TDI emissions to concentrations that do not exceed the TDI SGC of 14 ug/m<sup>3</sup> or AGC of 0.07 ug/m<sup>3</sup>.

Emission Source/Control: DISPR - Process  
Design Capacity: 340 gallons

Emission Source/Control: RX006 - Process  
Design Capacity: 450 gallons

Permit ID: 9-0412-00031/02001

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Emission Source/Control: RX009 - Process  
Design Capacity: 270 gallons

Emission Source/Control: RX010 - Process  
Design Capacity: 1,250 gallons

Emission Source/Control: RX013 - Process  
Design Capacity: 65 gallons

Emission Source/Control: RX015 - Process  
Design Capacity: 2,150 gallons

Emission Source/Control: RX019 - Process  
Design Capacity: 250 gallons

Emission Source/Control: STANK - Process  
Design Capacity: 14,000 gallons

**Item 22.7:**

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

Emission Unit: U-PWASH

Process: WSH

Process Description:

Process WSH includes the parts washer and associated emission points subject to 6 NYCRR Part 226.

Emission Source/Control: PW001 - Process

Emission Source/Control: PW002 - Process

Emission Source/Control: PW003 - Process

Emission Source/Control: PW004 - Process

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