



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-1402-00791/02002
Effective Date: 11/05/2014 Expiration Date: 11/04/2024

Permit Issued To: HUTCHINSON INDUSTRIES INC
92 MONSIGNOR VALENTE DR
BUFFALO, NY 14206

Contact: DAVID BONGIOVANNI
RODGARD DIV OF HUTCHINSON INC
92 MONSIGNOR VALENTE DR
BUFFALO, NY 14206
(716) 852-1435

Facility: RODGARD
92 MONSIGNOR VALENTE DR
BUFFALO, NY 14206

Contact: FRAN SMITH
RODGARD
92 MONSIGNOR VALENTE DR
BUFFALO, NY 14206
(716) 852-1435

Description:

Rodgard, a division of Hutchinson, conducts the following manufacturing processes; gluing and application of a multi-ply substrate to customer supplied fuel tanks and coating of the tanks with a polyurethane based coating system; molding, curing and finishing of plastic and nylon based parts for transportation applications.

Solvent based adhesive is applied to a multi-layered foam substrate to adhere to fuel tanks and other parts. Gluing operations may be conducted in booths 1 thru 10 and A,B,C or Maintenance Area booth. The volatile organic compound (VOC) content of the adhesives are subject to the regulatory requirements of 6NYCRR, Part 228-2 and are limited to 850 g/liter. MEK, a VOC, is used as the solvent for cleaning and prep and is also contained in the adhesive.

A polyurethane based protective coating is then applied over the outer most layer of the multi-layered foam substrate. The two component polyurethane coating consists of an isocyanate based pre-polymer and a polyol component that are mixed together in and applied by an airless spray gun. Methylene chloride, a hazardous air pollutant but not a volatile organic compound, is used



to clean-up parts and equipment. A spray gun cleaning/recycling cabinet is used for gun cleaning of all spray guns. High efficiency two-stage particulate filters designed to capture overspray are required for use in the polyurethane spray booths. Spraying operations can be conducted in any booth. The spraying operations are subject to 6NYCRR, Part 212.4(b) for the fine isocyanate particles rated 'A' particles.

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: ____ / ____ / ____



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 9 HEADQUARTERS



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 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.



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 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

New York State Department of Environmental Conservation

Permit ID: 9-1402-00791/02002

Facility DEC ID: 9140200791



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: HUTCHINSON INDUSTRIES INC
92 MONSIGNOR VALENTE DR
BUFFALO, NY 14206

Facility: RODGARD
92 MONSIGNOR VALENTE DR
BUFFALO, NY 14206

Authorized Activity By Standard Industrial Classification Code:
3089 - PLASTICS PRODUCTS, NEC

Permit Effective Date: 11/05/2014

Permit Expiration Date: 11/04/2024



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

EU=U-TANK1

- 2 6 NYCRR 228-2.4 (b) (1): Compliance Demonstration
3 6 NYCRR 228-2.4 (b) (3): Compliance Demonstration
4 6 NYCRR 228-2.4 (b) (4): Compliance Demonstration

EU=U-TANK1,Proc=P01

- 5 6 NYCRR 228-2.4 (a): Compliance Demonstration
6 6 NYCRR 228-2.4 (d): Compliance Demonstration
7 6 NYCRR 228-2.5 (a): Compliance Demonstration
8 6 NYCRR 228-2.5 (c): Compliance Demonstration
9 6 NYCRR 228-2.5 (d): Compliance Demonstration

EU=U-TANK1,Proc=P02

- 10 6 NYCRR 212.4 (b): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 11 ECL 19-0301: Contaminant List
12 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
13 6 NYCRR Subpart 201-5: Emission Unit Definition
14 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
15 6 NYCRR 201-5.3 (c): Compliance Demonstration
16 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 17 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
18 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

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

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

Item K: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item L: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Air pollution prohibited



Effective between the dates of 11/05/2014 and 11/04/2024

Applicable Federal Requirement:6 NYCRR 211.1

Item 1.1:

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

**** Emission Unit Level ****

Condition 2: Compliance Demonstration
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable Federal Requirement:6 NYCRR 228-2.4 (b) (1)

Item 2.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TANK1

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

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The concentration of volatile organic compounds (VOC) in all surface preparation solvents used at the facility shall be less than 70 grams per liter.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 70 grams per liter

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: Compliance Demonstration
Effective between the dates of 11/05/2014 and 11/04/2024

New York State Department of Environmental Conservation

Permit ID: 9-1402-00791/02002

Facility DEC ID: 9140200791



Applicable Federal Requirement:6 NYCRR 228-2.4 (b) (3)

Item 3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TANK1

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

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The composite vapor pressure of all cleanup solvents used
at the facility shall be less than 45 mm Hg at 20 degrees
Celsius.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: COMPOSITE VAPOR PRESSURE

Upper Permit Limit: 45 millimeters of mercury

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable Federal Requirement:6 NYCRR 228-2.4 (b) (4)

Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TANK1

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

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

When performing the removal of a commercial or industrial
adhesive, sealant, adhesive primer or sealant primer from
the parts of spray application equipment, the facility



owner or operator must:

1. use an enclosed cleaning system, or an equivalent cleaning system as determined by the applicable test method identified in 6 NYCRR Part 228-2.6(h);
2. use a solvent with a VOC content less than or equal to 70 grams per liter; and
3. soak all parts containing dried adhesive in a solvent with a composite vapor pressure, excluding water and exempt compounds, less than or equal to 9.5 mm Hg at 20 degrees Celsius. The solvent and any soaking parts must be kept in a closed container at all times except when adding or removing parts from the container.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: SOLVENT
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 70 grams per liter
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable Federal Requirement: 6 NYCRR 228-2.4 (a)

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TANK1
Process: P01

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

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

When a facility uses a commercial or industrial adhesive, sealant, adhesive primer or sealant primer, the concentration of the volatile organic compounds (VOC) shall not exceed the VOC content limits specified in Table 1 of 6 NYCRR Part 228-2.4. For adhesives applied to the listed substrates in Table 1, the respective VOC content



limits apply as follows:

(1) when an adhesive or sealant is subject to a specific VOC content limit in Table 1, the specific limit is applicable rather than an adhesive-to-listed-substrate limit; and

(2) if an adhesive is used to bond dissimilar substrates together, the applicable substrates category with the highest VOC content shall be the limit for such use.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: ADHESIVE
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 850 grams per liter
Monitoring Frequency: CONTINUOUS
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 6: Compliance Demonstration
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable Federal Requirement:6 NYCRR 228-2.4 (d)

Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TANK1
Process: P01

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

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Work practices for the application of adhesives shall include:

(1) the following types of application equipment, with the use of low-VOC adhesives or adhesive primers:
electrostatic spray; HVLP spray; flow coat; roll coat or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application; dip coat (including electrodeposition); airless spray; air-assisted airless spray; any other adhesive application method, subject to



Department approval, capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spraying;

- (2) the following work practices for storage, mixing operations, and handling operations for adhesives, thinners, and adhesive related waste materials that:
- (i) store all VOC containing adhesives, adhesive primers, and process related waste materials in closed containers;
 - (ii) ensure that mixing and storage containers used for VOC-containing adhesives, adhesive primers, and process related waste materials are kept closed at all times except when depositing or removing these materials;
 - (iii) minimize spills of VOC containing adhesives, adhesive primers, and process related waste materials;
 - (iv) convey VOC containing adhesives, adhesive primers, and process related waste materials from one location to another in closed containers or pipes.

- (3) the following work practices to reduce VOC emissions from cleaning materials used in industrial adhesive application processes that:
- (i) store all VOC containing cleaning materials and used shop towels in closed containers;
 - (ii) ensure that storage containers used for VOC containing materials are kept closed at all times except when depositing or removing these materials;
 - (iii) minimize spills of VOC containing cleaning materials;
 - (iv) convey VOC containing cleaning materials from one location to another in closed containers or pipes;
 - (v) minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Compliance Demonstration
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable Federal Requirement: 6 NYCRR 228-2.5 (a)

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TANK1

New York State Department of Environmental Conservation

Permit ID: 9-1402-00791/02002

Facility DEC ID: 9140200791



Process: P01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities using products subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) shall maintain records demonstrating compliance with the VOC content limits, including, but not limited to, the following information:

- (1) a list of each commercial and industrial adhesive, sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at the facility;
- (2) identification of each product by product name and description;
- (3) the VOC content of each product as supplied;
- (4) the mix ratio of any catalysts, reducers or other components used;
- (5) the final VOC content or vapor pressure, as applied; and
- (6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used at the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable Federal Requirement: 6 NYCRR 228-2.5 (c)

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TANK1

Process: P01

New York State Department of Environmental Conservation

Permit ID: 9-1402-00791/02002

Facility DEC ID: 9140200791



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

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records made to determine compliance with Subpart 228-2 shall be maintained for five years from the date such record is created and shall be made available to the Department within 90 days of a request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Compliance Demonstration
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable Federal Requirement:6 NYCRR 228-2.5 (d)

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TANK1
Process: P01

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

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities testing or evaluating adhesives, sealants, adhesive primers and sealant primers subject to the laboratory testing exemption in 6 NYCRR Part 228-2.2(a)(1), shall make and maintain records of all such materials used, including, but not limited to, the product name, the product category of the material or type of application and the VOC content of each material.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10: Compliance Demonstration
Effective between the dates of 11/05/2014 and 11/04/2024



Applicable Federal Requirement:6 NYCRR 212.4 (b)

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TANK1
Process: P02

Regulated Contaminant(s):
CAS No: 026447-40-5 BENZENE,1,1 MEYHYLENEBIS ISOCYANATO-
CAS No: 000101-68-8 METHYLENE BISPHENYL ISOCYANATE

Item 10.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The permittee operates fourteen spray booths for the application of adhesives and urethane coatings on metal fuel tanks associated with process P02. The urethane coatings contain polymeric methyl diisocyanate (PMDI) and methyl diisocyanate monomers (MDI). These isocyanates are characterized as both hazardous air pollutants (HAP) and volatile organic compounds (VOC).

The emission rate potentials (ERPs) and annual emissions of PMDI and diisocyanate monomers shall be estimated using the maximum capacity of the HVLP gun or other application equipment, transfer efficiency of the spray gun/applicator based on manufacturer's specifications or accepted literature and the highest content for each contaminant specified by the coating manufacturer, coating density, and mixing ratio. Based on the ERPs determined, the contaminants will be required to comply with the degree of cleaning specified under 6NYCRR 212.4(b) and 6NYCRR, Part 212.9 Table 2 for 'A' rated compounds and either 99% degree of air cleaning for ERPs between 1 to 10 lb/hr or the degree of air cleaning specified by the Department for ERPs less than 1 lb/hr.

Ambient impact modeling results for PMDI and MDI must demonstrate that the worst case ambient impacts as defined by the total emissions from all spray booths, do not exceed either the short-term (SGC) or annual guideline concentrations (AGC). The ambient impact of each contaminant shall be determined using acceptable air quality models such as AERSCREEN. Within 30 days of the permit issuance, the permittee shall submit acceptable emissions calculations for PMDI and MDI and the ambient impact demonstration based on those emissions.



Whenever coatings containing PMDI are spray applied, a high efficiency filtration system capable of capturing particles with diameters between 2.5 um and 10 um shall be used. These filters must have the minimum required removal efficiency to meet the applicable AGC and SGC. Within 30 days from the issuance of this permit, the permittee shall submit verification that the appropriate filters are in use.

Records of the quantity of coatings used, along with Material Safety Data sheets (MSDS) and/or Technical Data sheets to demonstrate the concentration of MDI and PMDI in the coatings, and the manufacturers' guarantees for the spray filters, shall be kept on-site for a minimum of 5 years and made available to Department representatives on request.

At all times the spray booth(s) shall operate under a negative pressure, verified by pressure gauges, and coatings shall be applied with a HVLP spray gun.

Spray application of coatings without the use of the booth and two-stage filtration system is prohibited. Any change in the filtration system must be reviewed and approved by NYSDEC prior to modification. In addition, to enhance dispersion of the pollutants emitted the height of the exhaust stack(s) must be at least 15 feet above the highest point of the building's roofline.

The particulate filters shall cover the entire exhaust opening and shall be maintained to ensure maximum capture efficiency at all times.

Magnehelic gauges shall be installed to check airflow and spray booth filters shall be changed when indicated according to manufacturer's specifications.

The spray booth particulate capture system shall be inspected to demonstrate that it is functioning properly. Inspections shall consist of the following observations made at the specified frequencies: (A) Inspection for holes in the particulate filters- weekly. (B) Inspection of the particulate filters to determine proper installation within the support rack- weekly. (C) Inspection of the exhaust fan to ensure that it is operating- whenever the spray booths begin operation. (D) Inspect the spray booth emission point for evidence of paint fallout (roof and surrounding areas) and for the presence of visible emissions during the spraying process. The presence of visible emissions indicates that the emission sources may not be operating properly and may



need servicing. (E) Weekly confirmation the magnehelic gauge is working. (F) Daily inspection of spray booth filters for paint build-up.

The permittee must initiate corrective action as soon as practicable after the occurrence of an observation or event indicating a problem.

Failure to monitor or failure to take corrective action under the requirements of this permit is a violation of 6NYCRR, Part 200.7 requirement to operate in a manner consistent with good air pollution control practices.

The permittee is required to maintain a spray booth inspection log to include the date and time of inspections, filter replacement, pressure drop readings and records of any necessary corrective action. The inspection log shall also contain the following additional information:

1. Maintenance schedule for each piece of spray booth/filter. At a minimum, the maintenance schedule shall meet the manufacturer's recommended schedule. The following information shall be recorded:
 - a. Identify the spray booth;
 - b. The date and time maintenance was performed;
 - c. Description of the type of maintenance;
 - d. Reason for performing maintenance;
2. The permittee shall maintain relevant records of the occurrence and duration of each startup, shutdown, or malfunction of process equipment and/or air pollution control equipment; and
3. The following information shall be recorded within 24 hours of any emergency exceedance:
 - a. The date of the emergency exceedance and the date the emergency exceedance was reported to NYSDEC;
 - b. The cause(s) of the emergency;
 - c. The reasonable steps taken to minimize the emissions during the emergency; and
 - d. A statement that the permitted equipment was at the time being properly operated.

New York State Department of Environmental Conservation

Permit ID: 9-1402-00791/02002

Facility DEC ID: 9140200791



Parameter Monitored: METHYLENE BISPHENYL ISOCYANATE

Lower Permit Limit: 99 percent degree of air cleaning or
greater

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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

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

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

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

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

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

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

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

Condition 11: Contaminant List
Effective between the dates of 11/05/2014 and 11/04/2024



Applicable State Requirement:ECL 19-0301

Item 11.1:

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

CAS No: 000101-68-8

Name: METHYLENE BISPHENYL ISOCYANATE

CAS No: 026447-40-5

Name: BENZENE,1,1 MEYHYLENEBIS ISOCYANATO-

CAS No: 0NY998-00-0

Name: VOC

**Condition 12: Malfunctions and start-up/shutdown activities
Effective between the dates of 11/05/2014 and 11/04/2024**

Applicable State Requirement:6 NYCRR 201-1.4

Item 12.1:

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

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

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

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

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

Condition 13: Emission Unit Definition
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 13.1:

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

Emission Unit: U-MOLD1

Emission Unit Description:

All chemical blending, heating, reaction and molding processes associated with the nylon parts molding process are associated with this emission unit. Emissions resulting from these processes are directed to emission points EP 00008 (Nylon Start-up/pilot process) and EP 00016 (Nylon Main Process exhaust).

Building(s): Main

Item 13.2:

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

Emission Unit: U-TANK1

Emission Unit Description:

Emissions from fuel tank gluing and urethane coating operations are captured under this emission unit. There are 15 combination glue/spray booths and one curing oven.

Building(s): Main
Outdoor

Condition 14: Renewal deadlines for state facility permits
Effective between the dates of 11/05/2014 and 11/04/2024

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

Item 14.1:

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

Condition 15: Compliance Demonstration
Effective between the dates of 11/05/2014 and 11/04/2024

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

Item 15.1:

New York State Department of Environmental Conservation

Permit ID: 9-1402-00791/02002

Facility DEC ID: 9140200791



The Compliance Demonstration activity will be performed for the Facility.

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 16: Visible Emissions Limited
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable State Requirement:6 NYCRR 211.2

Item 16.1:

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

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

Condition 17: Emission Point Definition By Emission Unit
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1:

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

Emission Unit: U-MOLD1

Emission Point: EP008

Height (ft.): 40

Diameter (in.): 30

NYTMN (km.): 4755.1

NYTME (km.): 187.7

Building: Main



Emission Point: EP016
Height (ft.): 40 Diameter (in.): 45
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Item 17.2:

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

Emission Unit: U-TANK1

Emission Point: EP001
Height (ft.): 40 Diameter (in.): 24
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Emission Point: EP002
Height (ft.): 52 Diameter (in.): 24
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Emission Point: EP003
Height (ft.): 40 Diameter (in.): 24
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Emission Point: EP004
Height (ft.): 40 Diameter (in.): 24
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Emission Point: EP005
Height (ft.): 40 Diameter (in.): 24
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Emission Point: EP006
Height (ft.): 40 Diameter (in.): 24
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Emission Point: EP007
Height (ft.): 52 Diameter (in.): 24
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Emission Point: EP009
Height (ft.): 30 Diameter (in.): 18
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Emission Point: EP010
Height (ft.): 52 Diameter (in.): 30
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Emission Point: EP011
Height (ft.): 52 Diameter (in.): 24
NYTMN (km.): 4755.1 NYTME (km.): 187.7 Building: Main

Emission Point: EP012
Height (ft.): 52 Diameter (in.): 24



NYTMN (km.): 4755.1	NYTME (km.): 187.7	Building: Main
Emission Point: EP013		
Height (ft.): 52	Diameter (in.): 24	
NYTMN (km.): 4755.1	NYTME (km.): 187.7	Building: Main
Emission Point: EP014		
Height (ft.): 40	Diameter (in.): 24	
NYTMN (km.): 4755.1	NYTME (km.): 187.7	Building: Outdoor
Emission Point: EP015		
Height (ft.): 40	Diameter (in.): 24	
NYTMN (km.): 4755.1	NYTME (km.): 187.7	Building: Main
Emission Point: EP017		
Height (ft.): 30	Diameter (in.): 8	
NYTMN (km.): 4755.1	NYTME (km.): 187.7	Building: Main

Condition 18: Process Definition By Emission Unit
Effective between the dates of 11/05/2014 and 11/04/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1:

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

Emission Unit: U-MOLD1
Process: P03
Process Description:
Heating, blending and reaction of chemicals to make nylon based products. Ingredients are initially heated in two nitrogen blanketed tanks and then combined into closed molds to final product formation.

Emission Source/Control: MOLD8 - Process

Emission Source/Control: MOLD9 - Process

Item 18.2:

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

Emission Unit: U-TANK1
Process: P01 Source Classification Code: 4-02-007-01
Process Description:
Solvent based adhesive is applied to a multi-layered foam substrate to adhere to fuel tanks and other parts. Gluing operations may be conducted in booths 1 thru 10 and A,B,C or Maintenance Area booth.

Emission Source/Control: HF001 - Process

Emission Source/Control: HF002 - Process



- Emission Source/Control: HF003 - Process
- Emission Source/Control: HF004 - Process
- Emission Source/Control: HF005 - Process
- Emission Source/Control: HF006 - Process
- Emission Source/Control: HF007 - Process
- Emission Source/Control: HF008 - Process
- Emission Source/Control: HF009 - Process
- Emission Source/Control: HF010 - Process
- Emission Source/Control: HF011 - Process
- Emission Source/Control: HF012 - Process
- Emission Source/Control: HF013 - Process
- Emission Source/Control: HF014 - Process
- Emission Source/Control: HF015 - Process
- Emission Source/Control: HF017 - Process

Item 18.3:

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

Emission Unit: U-TANK1

Process: P02

Source Classification Code: 4-02-025-01

Process Description:

This process entails the application of a polyurethane based protective coating over the outer most layer of the multi-layered foam substrate. The two component polyurethane coating consists of an isocyanate based pre-polymer and a polyol component that are mixed together in and applied by an airless spray gun. Methylene chloride is used to clean-up parts and equipment. A spray gun cleaning/recycling cabinet is used for gun cleaning of all spray guns. Spraying operations may be conducted in any booth.

- Emission Source/Control: HF001 - Process
- Emission Source/Control: HF002 - Process
- Emission Source/Control: HF003 - Process



- Emission Source/Control: HF004 - Process
- Emission Source/Control: HF005 - Process
- Emission Source/Control: HF006 - Process
- Emission Source/Control: HF007 - Process
- Emission Source/Control: HF008 - Process
- Emission Source/Control: HF009 - Process
- Emission Source/Control: HF010 - Process
- Emission Source/Control: HF011 - Process
- Emission Source/Control: HF012 - Process
- Emission Source/Control: HF013 - Process
- Emission Source/Control: HF014 - Process
- Emission Source/Control: HF015 - Process
- Emission Source/Control: HF017 - Process

