



**New York State Department of Environmental Conservation
Permit Review Report**

Permit ID: 1-4728-01128/00009

Renewal Number: 2

04/22/2016

Facility Identification Data

Name: MASON INDUSTRIES PROPERTY

Address: 350 RABRO DR
HAUPPAUGE, NY 11788

Owner/Firm

Name: MASON INDUSTRIES INC

Address: 350 RABRO DR
HAUPPAUGE, NY 11788, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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Air Permitting Contact:

Name: HENRY F SMITH

Address: MASON INDUSTRIES INC
350 RABRO DR
HAUPPAUGE, NY 11788
Phone:6313480282

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

This is a renewal of the Title V air permit issued to Mason Industries Property. The facility will continue its rubber production and surface coating operations. The emission units, sources, emission points and controls will remain unchanged since the last Title V renewal.



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The facility has agreed to accept a cap on emissions of total hazardous air pollutants (HAP) to avoid being subject to MACT standards. The facility will track its emissions of hazardous air pollutants on an annual total rolled monthly basis to demonstrate compliance with this requirement.

The surface coating operations are a source of VOC emissions subject to 6 NYCRR Part 228 regulations. The facility will keep records of the coatings and solvents purchased to calculate the VOC emissions on a monthly basis to demonstrate compliance.

Attainment Status

MASON INDUSTRIES PROPERTY is located in the town of ISLIP in the county of SUFFOLK. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

Mason Industries cuts, welds and shapes steel frame units of varying sizes and shapes to hold rubber sheeting that is wrapped around the frames in various configurations to create vibrational dampening devices. The rubber for this products is made on site. Rubber production includes milling and calendaring operations (Emission Unit 0-00002). The facility also operates a surface coating line which includes spray and dipping booths for the surface coating of miscellaneous parts (Emission Unit 0-00001). The facility's controls include paint spray booths with triple baffle to trap 95% of solids.

Emission Unit 0-00001 and the associated processes P01 and P03 are exempt from the requirements of 6NYCRR Part 212 as per 212-1.4(1)(1). Volatile Organic Compound emissions are regulated by 6NYCRR Part 228 and are not given an "A" rating.

Permit Structure and Description of Operations



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The Title V permit for MASON INDUSTRIES PROPERTY

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

MASON INDUSTRIES PROPERTY is defined by the following emission unit(s):

Emission unit 000001 - This emission unit consists of surface coating operations including a spray booth, paint storage area and dip booths.

The paint storage area contains floor sweeps and is exempt pursuant to 6 NYCRR Part 201-3.2(c) (42) provided coatings and paints are stored in closed containers when not in use.

Emission unit 000001 is associated with the following emission points (EP):

10001, 10004, 10005, 10011

Process: P01 is located at 1st Floor, Building M - This process consists of a paint spray booth exhausted by two 30" general exhaust fans that combine into a 30" exhaust duct serving as emission point. Applied lacquer/paint contains approx. 40% solids. Assume 25% overspray. Triple baffles trap 95% of solids.

Process: P03 is located at 1st Floor, Building M - This process consists of dip booths that are used for coating parts. Small steel parts are dipped in paint and allowed to hang over the paint trough to dip dry. Canopy enclosures over the drip areas collect the air that is vented out.

Emission unit 000002 - This emission unit is a rubber production and product fabrication area consisting of a 36" mill, 60" mill, calenders, a bias cutter, and 3 autoclaves. Autoclave steam emissions are exempt from permitting requirements.

Emission unit 000002 is associated with the following emission points (EP):

20007, 20008

Process: P02 is located at 1st Floor, Building M - The rubber production process consists of pug milling rubber components, carbon black, magnesium oxide and clay. The resulting rubber is fed through



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calenders which are cut to client specifications and applied to steel frames to create the final product. Emissions from the pug mills are vented to the outside. Solvent is hand applied to the mandrill to prepare it for rubber removal once the product has been created.

The manual application of solvents is a trivial process pursuant to 6 NYCRR Part 201-3.3(c) (53) and is exempt pursuant to 6 NYCRR Part 228.1(c) (6).

Title V/Major Source Status

MASON INDUSTRIES PROPERTY is subject to Title V requirements. This determination is based on the following information:
Mason Industries is a major source of emissions of Volatile Organic Compounds (VOC). The facility is subject to Title V requirements because they have opted not to cap emissions below major source thresholds.

The Facility has a PTE range of the following for each compound, all of which exceed majot source thresholds:

For VOC: 50 TPY >= PTE <100 TPY

Program Applicability

The following chart summarizes the applicability of MASON INDUSTRIES PROPERTY with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.



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NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of



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activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3069	FABRICATED RUBBER PRODUCTS, NEC

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-08-006-99	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS - OTHER FABRICATED PLASTICS Other Not Classified
4-02-009-98	SURFACE COATING OPERATIONS THINNING SOLVENTS - GENERAL General: Specify in Comments

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	Range
		lbs/yr	
000108-10-1	2-PENTANONE, 4-METHYL	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	> 0	but < 2.5 tpy
000100-41-4	ETHYLBENZENE	> 0	but < 10 tpy



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000050-00-0	FORMALDEHYDE	19000	
000110-54-3	HEXANE		> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL		> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE		> 0 but < 10 tpy
000121-44-8	N,N-DIETHYL ETHANAMINE		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		> 0 but < 2.5 tpy
0NY075-00-0	PARTICULATES		> 0 but < 2.5 tpy
0NY075-00-5	PM-10		> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE		> 0 but < 2.5 tpy
000108-88-3	TOLUENE		>= 10 tpy
0NY100-00-0	TOTAL HAP	49000	
0NY998-00-0	VOC	4437	
001330-20-7	XYLENE, M, O & P MIXT.		> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section



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503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

Owners and/or operators of facilities having an issued Title V 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.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as



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of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.



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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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description

FACILITY	ECL 19-0301	38	Powers and Duties of the Department with respect to air

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FACILITY	40CFR 68	19	pollution control
FACILITY	40CFR 82-F	20	Chemical accident prevention provisions
FACILITY	6NYCRR 200.6	1	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.7	10	Acceptable ambient air quality.
FACILITY	6NYCRR 201-1.4	39	Maintenance of equipment.
FACILITY	6NYCRR 201-1.7	11	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.8	12	Recycling and Salvage
FACILITY	6NYCRR 201-3.2(a)	13	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.3(a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	21, 33, 34	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.4(a)(4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)(2)	4	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(d)(4)	22	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(f)(6)	17	Compliance Certification
FACILITY	6NYCRR 201-6.4(g)	23	Off Permit Changes
FACILITY	6NYCRR 201-7.1	24	Permit Shield
FACILITY	6NYCRR 202-1.1	18	Emission Capping in Facility Permits
FACILITY	6NYCRR 202-2.1	7	Required emissions tests.
FACILITY	6NYCRR 202-2.5	8	Emission Statements - Applicability
FACILITY	6NYCRR 211.1	27	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	40	General Prohibitions - air pollution prohibited
			General Prohibitions - visible emissions



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0-00002	6NYCRR 212-1.6 (a)	36	limited.
0-00002/20007	6NYCRR 212-2.4 (b)	37	Limiting of Opacity Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 228-1.1 (a) (3)	28	Once in always in
FACILITY	6NYCRR 228-1.3 (a)	29	Surface Coating General Requirements- Opacity
FACILITY	6NYCRR 228-1.3 (b)	30	Surface Coating General Requirements- Recordkeeping
0-00001	6NYCRR 228-1.3 (b)	35	Surface Coating General Requirements- Recordkeeping
FACILITY	6NYCRR 228-1.3 (c)	31	Surface Coating General Requirements- Prohibitions
FACILITY	6NYCRR 228-1.6 (a)	32	Surface coating VOC analysis.

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for



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a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to 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.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the



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time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 201-6.4 (g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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.



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40 CFR Part 68

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, MASON INDUSTRIES PROPERTY has been determined to be subject to the following regulations:

6 NYCRR 201-7.1

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid MACT (Maximum Achievable Control Technology) requirements under 40 CFR part 63 subpart U using federally enforceable permit conditions.

6 NYCRR 211.1

This regulation requires that 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.

6 NYCRR 212-1.6 (a)

This provision requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.



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6 NYCRR 228-1.1 (a) (3)

This citation dictates that any coating line, which is or becomes subject to the requirements of this regulation, will remain subject to its requirements even if the reason they were subject later falls below the applicability threshold.

6 NYCRR 228-1.3 (a)

This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (b)

This citation requires the facility to keep records of coating and solvent purchases for the purposes of VOC emission calculations.

6 NYCRR 228-1.3 (c)

This citation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

6 NYCRR 228-1.6 (a)

This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirements of the regulation.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
0-00001	6 NYCRR Part 212	General Process Emission Sources



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Reason: This emission unit and associated processes P01 and P03 are exempt from the requirements of 6NYCRR Part 212 as per 212-1.4(1)(1). Volatile organic compound emissions are regulated by 6NYCRR Part 228 and are not given an A rating.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at MASON INDUSTRIES PROPERTY:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
0-00002	36	monitoring of process or control device parameters as surrogate
0-00002/20007	37	intermittent emission testing
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	record keeping/maintenance procedures
0-00001	35	record keeping/maintenance procedures
FACILITY	32	monitoring of process or control device parameters as surrogate

Basis for Monitoring

Condition 5 – 6NYCRR Part 201-6.4(c)(3)(ii)

The facility must notify the department of any permit deviations and incidences of noncompliance as required by this Part. Compliance is determined by the accurate and timely submission of these notifications.

Reports of any required monitoring must be submitted at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These requirements apply to all Title V facilities



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Condition 6 – 6NYCRR Part 201-6.4(e)

Compliance certifications must be submitted annually in accordance with the provisions of this Part in order to demonstrate compliance with this requirement. This monitoring requirement applies to all Title V facilities.

Condition 7 – 6NYCRR Part 202-2.1

The facility must submit emission statements as described in 6 NYCRR Part 202-2 in order to demonstrate compliance with this requirement. The emission statement for the previous calendar year must be submitted annually by April 15th. This monitoring requirement applies to all Title V facilities.

Condition 25 – 6NYCRR Part 201-7.1

The facility has an emission cap for total HAP of 24.5 tons per year to avoid being subject to 40 CFR Part 63 subpart U MACT requirements.

Compliance shall be determined by usage records for each coating, solvent, thinner, additive and cleaning material which include the following calculations:

12-month rolling total HAP emissions for coating, thinner, additive and cleaning material used

12-month rolling emissions for each individual HAP

Reports must be submitted to the Department annually (calendar).

Condition 26 – 6NYCRR Part 201-7.1

The facility has an emission cap of 9.5 tons per year for each of the following individual HAPS:

- CAS No. 000050-00-0: Methyl Alcohol
- CAS No. 000100-41-4: Ethylbenzene
- CAS No. 000108-10-1: 2-pentanone-4methyl
- CAS No. 000108-88-3: Toluene
- CAS No. 000121-44-8: n, n-diethyl ethanamine
- CAS No. 000121-44-8: Xylene, m, o & p mixt.
- CAS No. 001330-20-7: Formaldehyde

To avoid being subject to 40 CFR Part 63 subpart U MACT requirements.

Compliance shall be determined by usage records for each coating, solvent, thinner, additive and cleaning material which include the following calculations:



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12-month rolling total HAP emissions for coating, thinner, additive and cleaning material used

12-month rolling emissions for each individual HAP

Reports must be submitted to the Department annually (calendar).

Condition 28 – 6NYCRR Part 228-1.3(a)

Compliance is demonstrated by conducting a Method 9 opacity evaluation at a minimum frequency of once per year, while the source is in normal operating mode. In addition, the permittee will conduct periodic observation of emission points. Opacity is not to exceed 20% during any consecutive 6 minute period. Semiannual and annual compliance reports must include a summary of these observations.

Condition 30 – 6NYCRR Part 228-1.3(b)

The facility must obtain and keep certifications from coating suppliers or manufacturers that verify the parameters used to determine the actual VOC content of all coatings used at the facility. Purchase, usage and/or production records must also be maintained. These records must be provided to the department upon request.

Condition 32 – 6 NYCRR Part 228-1.6(a)

The facility must determine the actual VOC content of an as applied coating by measuring the volatile content in accordance with EPA Reference Method 311 or Method 24 or an alternate sampling method that had been approved by both the Department and the Administrator. The VOC content must not exceed 3.0 pounds per gallon of coating. Records must be provided to the Department upon request.

Condition 35 - 6NYCRR Part 228-1.3(b)

The facility must obtain and keep certifications from coating suppliers or manufacturers that verify the parameters used to determine the actual VOC content of all coatings used at the facility. Records for the air cleaning device with a removal efficiency of at least 85 percent must be kept at the facility. Reports must be submitted to the Department semi-annually.

Condition 36 - 6NYCRR Part 212-1.6(a)

Daily observations of the stack outlet while the rubber production process is operating must be made to demonstrate compliance with this requirement. These observations must be recorded in a bound log book and be made available to the Department upon request. Opacity is not to exceed 20% during any consecutive 6 minute period. If visible emissions exceeding the standard are observed for two consecutive days, an EPA Method 9 visible emissions test must be performed by a certified observer. Semiannual and annual compliance reports must include a summary of these observations.



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Condition 37 - 6NYCRR Part 212-2.4(b)

Compliance is demonstrated by stack testing of the stack outlet while the rubber production process is operating to demonstrate that the particulate emissions do not exceed 0.050 grains per cubic foot of exhaust gas. Testing must be performed once per permit term in accordance to EPA reference Method 5. Records must be submitted to the Department upon request.