



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-4228-00076/00117

Renewal Number: 2

Modification Number: 1 07/31/2017

Facility Identification Data

Name: VON ROLL USA INC
Address: 200 VON ROLL DR
SCHENECTADY, NY 12306

Owner/Firm

Name: VON ROLL USA INC
Address: 200 VON ROLL DR
SCHENECTADY, NY 12306-2496, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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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 project involves the following: 1) addition of three new coating lines in RV14; 2) establishment of a volatile organic compound (VOC) emission cap for the proposed project for the purpose of avoiding New Source Review; 3) improvements to thermal oxidizer 1 (OX1), which consists of two sections (OX1-A and OX1-B) that currently function as one active unit and one stand-by unit that are not operated



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simultaneously, that will enable the two units to operate simultaneously (OXA and OXB); 4) reconfiguration of RV14 non-compliant coating line emission units into a single emission unit (1-14NCC) to accommodate new alternative operating scenarios to allow coating lines to be vented to alternate thermal oxidizers in the event the primary thermal oxidizer is down for maintenance or repair; 5) replacement of the large oven (LOVEN) with a new large oven (NLOVN) in Emission Unit 1-14CC1; 6) addition of a new slitter (SLITE) in Emission Unit 1-14SL1; and 7) the incorporation of mixing and packaging equipment that has been installed in RV33 using the off-permit changes provision in 6 NYCRR 201-6.4(f)(6).

The three new coating lines are: Mica Machine (0MICA), Ballistic & Flex Laminator (BFLAM), and Multi-Pass Tower (00VT3). The new coating lines will be installed in phases as follows: 0MICA – upon permit issuance, BFLAM – May-June 2016, 00VT3 – August-September 2016. Product transfer from existing coating lines to the new lines will occur over the course of approximately one year (May 2016 through June 2017). This schedule is subject to revision.

The likely venting scenarios for coating lines in Emission Unit 1-14NCC will be as follows:
0MICA and BFLAM – 00OXA (primary), 00OXB and 00OX2 (alternate)
01040, 00LAM, 00VT1, and 00VT2 – 00OXB (primary), 00OXA and 00OX2 (alternate)
00VT3 – 00OX2 (primary), 00OXA and 00OXB (alternate)

The Project Emission Potential (PEP) for VOC has been estimated to be greater than 40 tons per year (tpy). The PEP calculations are based on the new coating lines each applying a coating containing the highest amount of VOC and HAP, based on current product lines manufactured by Von Roll. The PEP also includes VOC emissions resulting from combustion of natural gas by the hot oil system and oxidizers, assuming the burners operate at maximum capacity for 8,760 hours per year. The PEP also includes upstream emissions from RV33, which are based on making the maximum amount of coating that could be applied by the new coating lines during a year, and using the coating grades containing the highest amount of VOC that are anticipated to be used on the new coating lines.

The new coating lines will be subject to 40 CFR Part 63, Subpart OOOO, Printing, Coating, and Dying of Fabrics and Other Textiles National Emissions Standards for Hazardous Air Pollutants. In addition, the new coating lines will be subject to 40 CFR Part 60, Subpart VVV, Standards of Performance for Polymeric Coating of Supporting Substrates.

A natural gas-fired hot oil system will provide heat to the oven sections of the new coating lines. The burner associated with the hot oil system will have an estimated maximum heat input capacity of 7 million British thermal units per hour (MMBtu/hr). As such, this combustion unit is exempt from permitting [6 NYCRR 201-3.2(c)(1)]. However, the hot oil system will be regulated as a new natural gas-fired process heater under 40 CFR Part 63, Subpart DDDDD (NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters).

Two coating lines and a dryer have been, or will be, shut down as part of this project. The Reverse Roll Coater (RRC) and 1196 Treater (dryer) have been shut down, and the 1050 coater is slated for shut down during January 2016.

Attainment Status

VON ROLL USA INC is located in the town of ROTTERDAM in the county of SCHENECTADY. 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



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Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL 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:

The Riverview facility at 200 Von Roll Drive is primarily engaged in the manufacture of electrical insulating and related materials. The solids manufacturing is based in building RV14 where surface coating operations coat or impregnate glass cloth, fibers, mineral mica and other materials. Building RV14 also houses other support operations. The liquids manufacturing is primarily based in Building RV33 where varnishes (reacted and blended), intermediates and related materials are manufactured for application in the solids area or shipped offsite. The facility has additional buildings for supporting operations and administrative functions.

Permit Structure and Description of Operations

The Title V permit for VON ROLL USA INC

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.

VON ROLL USA INC is defined by the following emission unit(s):

Emission unit 114SL1 - RV14 Slitter/Packing Ventilation (EPN 12015, 12018, 12019, 12020) and a Mica Dust Knockout Unit (EPN 12035) includes the emissions from the slitters used to cut the materials produced on the treaters into various widths and the associated Packing Areas. Includes ventilation emission from the new RV14 drum compactor for compacting scrap tape and other materials.



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Emission unit 114SL1 is associated with the following emission points (EP):
12015, 12018, 12019, 12020, 12035

Process: SLD is located at FIRST FLOOR, Building RV14 - Slitter Ventilation at slitter D picks up edge trimmings from master rolls containing mica dust lost by the processing of master roll to tape roll by slitting and packaging.

Process: SLV is located at FIRST FLOOR, Building RV14 - Slitter Ventilation picks up trace amounts of volatiles lost by the processing of master roll to tape roll by slitting and packaging.

Emission unit 2TANKS -

Emission unit 2TANKS is associated with the following emission points (EP):
12165, 12166, 12167, 12168, 12169, 12170, 12171, 12172

Process: TK3 is located at Building TANKFARM - Storage tanks containing HAP and subject to the MCM or MON regulation, to be determined based on predominant use.

Process: TK4 is located at Building TANKFARM - Vertical storage tanks containing VOC (no HAP)

Emission unit 114NC1 - RV14 Non-compliant Coating Lines: includes all the emissions from four existing surface coating lines (Laminator, 1040 Treater, Vertical Towers 1 & 2), and three new coating lines (Mica Machine, Ballistic & Flex Laminator, and Multi-Pass Tower). Unit includes any fugitive emissions, emissions from the natural gas fired in the treater ovens and the fuel used in the thermal oxidizers to maintain the operating temperature. Existing Coating lines (Process CC2) can also operate based on the use of compliant coatings (≤ 2.9 lb VOC/gal for fabric, ≤ 0.08 lb VOC/lb coating for paper/film, and ≤ 0.12 lb organic HAP/lb of solids applied for each coating material and use of only thinning and cleaning materials that contain no organic HAP (i.e., no organic HAP is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 20 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds) in compliance with 40 CFR Part 63, Subpart OOOO, Fabric Coating NESHAP) at which time the process does not require control equipment. However, control is required when using HAP containing thinners or cleanup solvents, in accordance with 40 CFR Part 63, Subpart OOOO.

Emission unit 114NC1 is associated with the following emission points (EP):

12006, 12007, 12008, 12012, 12013, 12016, 12017, 12039, 12040, 12041, 12042, 12044

Process: CC2 is located at FIRST FLOOR, Building RV14 - This process includes the use of compliant coatings on four of the treaters in EU 1-14NC1, which are subject to the Fabric Coating NESHAP (40 CFR Part 63, Subpart OOOO). Process includes all VOC and HAP in the coating systems and any solvents used. Includes the following processes: 1040 Treater, Laminator and Vertical Towers 1 & 2. Compliant coatings are those that contain ≤ 0.08 lb VOC/lb coating for paper coating and ≤ 2.9 lb VOC/gallon of coating for fabric coating in accordance with Subpart 228-1, and ≤ 0.12 lb organic HAP/lb of solids applied for each coating material and use of only thinning and cleaning materials that contain no organic HAP (i.e., no organic HAP is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 20 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds) in accordance with 40 CFR Part 63, Subpart OOOO (Fabric Coating NESHAP).

Process: FB1 is located at FIRST FLOOR, Building RV14 - Natural gas fuel burning associated with EU 1-14NC1 (the coating line ovens and the fuel used to maintain the temperature of the three thermal oxidizers).



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Process: NC1 is located at FIRST FLOOR, Building RV14 - All 4 surface coating lines associated with Process NC1 are batch operations employing a wide variety of non-compliant coatings (>2.9 lb VOC/gal. for fabric and > 0.08 lb VOC/lb coating for paper/film in accordance with Subpart 228-1, and > 0.12 lb organic HAP/lb of solids applied for each coating material and use of thinning and cleaning materials that contain organic HAP (i.e., organic HAP is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 20 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds) in accordance with the Fabric Coating NESHAP (40 CFR Part 63, Subpart OOOO). Process includes all VOCs and HAPs in the coating systems and in any solvents used. Also see FB1 for fuel burning from this source.

Process: NC2 is located at FIRST FLOOR, Building RV14 - The surface coating lines associated with process NC2 are batch operations employing a wide variety of non-compliant coatings (>2.9 lb VOC/gal for fabric and > 0.08 lb VOC/lb coating for paper/film in accordance with Subpart 228-1, and > 0.12 lb organic HAP/lb of solids applied for each coating material and use of thinning and cleaning materials that contain organic HAP (i.e., organic HAP is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 20 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds) in accordance with the Fabric Coating NESHAP (40 CFR Part 63, Subpart OOOO). The new Multi-Pass Tower is also subject to 40 CFR Part 60, Subpart VVV. Also see FB1 for fuel burning from this source.

Process: NC3 is located at First Floor, Building RV14 - The surface coating lines associated with process NC3 are batch operations employing a wide variety of non-compliant coatings (>2.9 lb VOC/gal for fabric and > 0.08 lb VOC/lb coating for paper/film in accordance with Subpart 228-1, and > 0.12 lb organic HAP/lb of solids applied for each coating material and use of thinning and cleaning materials that contain organic HAP (i.e., organic HAP is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 20 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds) in accordance with the Fabric Coating NESHAP (40 CFR Part 63, Subpart OOOO). The new Mica Machine and new Ballistic and Flex Laminator are also subject to 40 CFR Part 60, Subpart VVV. Also see FB1 for fuel burning from this source.

Emission unit 142001 -

Emission unit 142001 is associated with the following emission points (EP):
12304

Process: DRM is located at FIRST FLOOR, Building RV42 -

Emission unit 114CC1 - RV14 Compliant Coating Lines: Includes emissions from three coating lines, the Kiss Coater (OKISS), Kiss II Coater (KISS2), and 1531 Hot Melt Treater (01531), which treat substrates using low volatile coatings. EP 12009 serves the Kiss Coater. Emissions from the Kiss Coater also vent to EP 12023, which also receives emissions from the Kiss II Coater and the 1531 Hot Melt Treater. This emission unit also includes the small (SOVEN, EP12022), the large oven (LOVEN, EP 12021), and the new large (NLOVN, EP 12021) ovens, which are used to cure the substrates treated by the Kiss Coater, Kiss II Coater, and 1531 Hot Melt Treater.

Compliant coatings are those that contain \leq 0.08 lb VOC/lb coating for paper coating and \leq 2.9 lb VOC/gallon of coating for fabric coating in compliance with Subpart 228-1, and \leq 0.04 lb organic HAP/lb coating materials applied each month or \leq 0.20 lb organic HAP/lb coating solids applied each month in compliance with 40 CFR Part 63, Subpart JJJJ (Paper and Other Web Coating NESHAP), or \leq 0.12 lb organic HAP/lb of solids applied for each coating material and use of only thinning and cleaning materials that contain no organic HAP (i.e., no organic HAP is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 20 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other



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compounds) in compliance with 40 CFR Part 63, Subpart OOOO (Fabric Coating NESHAP).

Kiss and Kiss II coat primarily paper substrates, and the 1531 Hot Melt coats primarily fabric substrates.

The Kiss and Kiss II Coaters are subject to 40 CFR Part 63, Subpart JJJJ - Paper and Other Web Coating (POWC) NESHAP. The 1531 Hot Melt coater is subject to 40 CFR Part 63, Subpart OOOO - Fabric Coating NESHAP. All three coating lines are subject to 6 NYCRR Subpart 228-1 - Surface Coating Processes.

In addition, Kiss II coater (KISS2) is subject to 40 CFR Part 60, Subpart VVV - Polymeric Coating of supporting substrates.

Emission unit 114CC1 is associated with the following emission points (EP):
12009, 12021, 12022, 12023

Process: CC1 is located at FIRST FLOOR, Building RV14 - This process includes the use of compliant coatings on the Kiss Coater, which is subject to the Paper and Other Web Coating NESHAP (40 CFR Part 63, Subpart JJJJ). Includes the Small and Large Batch Ovens. Also see FB-2 for fuel burning associated with the ovens. Compliant coatings are those that contain \leq 0.08 lb VOC/lb coating for paper coating and \leq 2.9 lb VOC/gallon of coating for fabric coating in accordance with Subpart 228-1, and \leq 0.04 lb organic HAP/lb coating materials applied each month or \leq 0.20 lb organic HAP/lb coating solids applied each month in accordance with 40 CFR Part 63, Subpart JJJJ (Paper and Other Web Coating NESHAP).

Process: CC4 is located at First Floor, Building RV14 - This process includes the use of compliant coatings on the Kiss II Coater, which is subject to the POWC NESHAP (40 CFR Part 63, Subpart JJJJ) and NSPS Subpart VVV. Includes the Small and Large Batch Ovens. Also see FB2 for fuel burning associated with these sources. Compliant coatings are those that contain \leq 0.08 lb VOC/lb coating for paper coating and \leq 2.9 lb VOC/gallon of coating for fabric coating in accordance with Subpart 228-1, and \leq 0.04 lb organic HAP/lb coating materials applied each month or \leq 0.20 lb organic HAP/lb coating solids applied each month in accordance with 40 CFR Part 63, Subpart JJJJ (Paper and Other Web Coating NESHAP).

Process: CC5 is located at First Floor, Building RV14 - This process includes the use of compliant coatings on the 1531 Hot Melt Treater, which is subject to the Fabric Coating NESHAP (40 CFR Part 63, Subpart OOOO). Includes the Small and Large Batch Ovens. Also see FB2 for fuel burning associated with these sources. Compliant coatings are those that contain \leq 0.08 lb VOC/lb coating for paper coating and \leq 2.9 lb VOC/gallon of coating for fabric coating in accordance with Subpart 228-1, and \leq 0.12 lb organic HAP/lb of solids applied for each coating material and use of only thinning and cleaning materials that contain no organic HAP (i.e., no organic HAP is present at 0.1% by mass or more for OSHA-defined carcinogens as specified in 20 CFR 1910.1200(d)(4) and at 1.0% by mass or more for other compounds) in accordance with 40 CFR Part 63, Subpart OOOO (Fabric Coating NESHAP).

Process: FB2 is located at FIRST FLOOR, Building RV14 - Natural Gas Burning associated with EU 1-14CC1 (Small and Large Batch Ovens).

Emission unit 133001 - RV33 Misc. General Processes: currently includes the emissions from reactor and mixing operations in building RV33.

This emission unit is comprised of equipment subject to:

- 40 CFR Part 63, Subpart FFFF, Miscellaneous Organic Chemical Manufacturing (MON)
- 40 CFR Part 63, Subpart HHHHH, Miscellaneous Coating Manufacturing (MCM).



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- 40 CFR Part 63, Subpart JJJJ, Paper and Other Web Coating (POWC)
- 40 CFR Part 63, Subpart OOOO, Printing, Coating, and Dyeing of Fabrics and Other Textiles (Fabric Coating).

The MON processes, which involve equipment used to make products where a chemical reaction takes place, are 707, 712, 724, ACR, AIR, OCC, FAB, DAI, MIC, PEI, SIL, SOL, STY, TBS, and WAT. The MCM process (MCM) consists of equipment used to make blended coatings that are sent off site. When making blended coatings that are used on site in Building RV14 surface coating operations, the associated equipment is considered affiliated operations subject to either Subpart JJJJ or OOOO. These affiliated operations comprise process AFL. A transfer rack (00TWL), which is subject to the MON, is in process TRN.

Emission unit 133001 is associated with the following emission points (EP):

12100, 12101, 12102, 12103, 12104, 12105, 12106, 12107, 12108, 12109, 12110, 12112, 12113, 12122, 12123, 12124, 12126, 12127, 12130, 12131, 12132, 12133, 12139, 12140, 12141, 12142, 12143, 12144, 12145, 12148, 12149, 12150, 12151, 12152, 12153, 12155, 12156, 12157, 12158

Process: OCC is located at Building RV33 - CC-3315 family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: 707 is located at Building RV33 - 707 family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: 712 is located at Building RV33 - 712 family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: 724 is located at Building RV33 - 724 family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: ACR is located at Building RV33 - AcryMethacry family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: AFL is located at Building RV33 - Preparation of coatings applied on site as part of affiliated operations subject to paper and Other Web Coating NESHAP (40 CFR Part 63, Subpart JJJJ) or Fabric Coating NESHAP (40 CFR Part 63, Subpart OOOO). This process is not subject to either the MON or MCM regulations.

Process: AIR is located at Building RV33 - Air Dry family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: DAI is located at Building RV33 - DAIP family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: FAB is located at Building RV33 - Coated Fabrics family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: MCM is located at Building RV33 - Preparation of coatings subject to the Miscellaneous Coating Manufacturing (MCM) regulation (40 CFR Part 63, Subpart HHHHH).

process vents subject to the MON.



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Process: PEI is located at Building RV33 - PEI family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: SIL is located at Building RV33 - Silicone family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: SOL is located at Building RV33 - Solvent Bake family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: STY is located at Building RV33 - Styrene family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: TBS is located at Building RV33 - TBS family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Process: TRN is located at Building RV33 - Group 2 transfer rack used to load MON- and/or MCM-regulated products to tanks trucks.

Process: WAT is located at Building RV33 - Water Borne family of materials (FOM) consisting of Group 2 process vents subject to the MON.

Emission unit 1TANKS - This emission unit includes one 10,000-gallon horizontal solvent storage tank (TNK09, renamed from 000M9) and four vertical solvent storage tanks (TNK10, TNK11, TNK12, TNK13). Due to the tanks' predominant use, they are regulated under the MCM NESHAP and meet the definition of Group 2 storage tank. TNK09, TNK10, TNK11, TNK12 operate with a nitrogen blanket. All five tanks are equipped with conservation vents.

Emission unit 1TANKS is associated with the following emission points (EP):
12146, 12147, 12161, 12162, 12163, 12164

Process: TK1 is located at Building TANKFARM -

Process: TK2 is located at Building TANKFARM -

Title V/Major Source Status

VON ROLL USA INC is subject to Title V requirements. This determination is based on the following information:

Von Roll is major for VOC and HAP

Program Applicability

The following chart summarizes the applicability of VON ROLL USA INC with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO



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NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
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.

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 212-3, 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



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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 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

2821	PLASTICS MATERIALS AND RESINS
2851	PAINTS AND ALLIED PRODUCTS
3299	NONMETALLIC MINERAL PRODUCTS
2295	COATED FABRICS, NOT RUBBERIZED

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

3-99-900-03	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS MANUFACTURING INDUSTRIES NATURAL GAS: PROCESS HEATERS
3-99-999-99	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES SEE COMMENT **
4-02-010-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - COATING OVEN HEATER Natural Gas
4-02-999-95	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS Specify in Comments Field
4-07-999-97	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - MISCELLANEOUS Specify in Comments



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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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000092-52-4	1, 1 BIPHENYL				
000121-91-5	1, 3- BENZENEDICAR BOXYLIC ACID				
000084-74-2	1,2- BENZENEDICAR BOXYLIC ACID, DIBUTYL ESTER				
000120-80-9	1,2- BENZENEDIOL				
000098-29-3	1,2- BENZENEDIOL, 4- (1,1- DIMETHYLETHY L)-				
000110-18-9	1,2- ETHANEDIAMINE , N,N,N',N',- TETRAMETHYL-				
000107-21-1	1,2-ETHANEDIOL				
000108-38-3	1,3 DIMETHYL BENZENE				
000100-97-0	1,3,5,7- ETRAAZATRICYC LO(3.3.1.13,7)DECAN E (9CI)				
000839-90-7	1,3,5-TRIAZINE- 2,4,6(1H,3H,5H)- TRIONE,1,3,5- TRIS(2- HYDROXY)				
001087-21-4	1,3- BENZENECARBO XILIC ACID, DI-2- PROPENYL ESTER				
000495-54-5	1,3-				



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000108-46-3	BENZENEDIAMIN E, 4- (PHENYLAZO)- 1,3-
000085-44-9	BENZENEDIOL 1,3-
000126-30-7	ISOBENZOFURA NDIONE 1,3-
000115-77-5	PROPANEDIOL, 2,2-DIMETHYL- 1,3- PROPANEDIOL,2, 2- BIS(HYDROXYM ETHYL)- (9CI)
000100-21-0	1,4- BENZENEDICAR BOXYLIC ACID
000123-31-9	1,4- BENZENEDIOL
001948-33-0	1,4- BENZENEDIOL, 2- (1,1- DIMETHYLETHY L)-
000088-58-4	1,4- BENZENEDIOL, 2,5-BIS(1,1- DIMETHYLETHY L)-
000123-91-1	1,4-DIETHYLENE DIOXIDE
001653-40-3	1-HEPTANOL, 6- METHYL
000104-76-7	1-HEXANOL, 2- ETHYL
000872-50-4	1-METHYL-2- PYRROLIDONE
000108-03-2	1- NITROPROPANE
000098-86-2	1- PHENYLETHANO NE
000111-77-3	2-(2- METHOXYETHO XY)-ETHANOL
000102-71-6	2,2,2- NITRILOTRIS ETHANOL
000105-67-9	2,4 XYLENOL
000837-08-1	2,4'-BISPHENOL A
000108-31-6	2,5 - FURANDIONE
025377-73-5	2,5- FURANDIONE, 3- (DODECENYL)DI HYDRO-
000141-43-5	2- AMINOETHANOL
001338-23-4	2-BUTANONE PEROXIDE
000096-29-7	2-BUTANONE,



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000624-48-6	OXIME 2-BUTENEDOIC ACID (Z)-, DIMETHYL ESTER
000078-59-1	2-CYCLOHEXEN- 1-ONE,3,5,5- TRIMETHYL
000108-01-0	2-DIMETHYL AMINO ETHANOL
000149-57-5	2- ETHYLHEXANOI C ACID
001589-47-5	2-METHOXY-1- PROPANOL
070657-70-4	2-METHOXY-1- PROPANOL ACETATE
000095-48-7	2-METHYL- PHENOL
000108-10-1	2-PENTANONE, 4- METHYL
000107-98-2	2-PROPANOL, 1- METHOXY
000108-65-6	2-PROPANOL, 1- METHOXY- ACETATE
009003-18-3	2- PROPENENITRILE , POLYMER W/ 1,3, BUTADIENE
000080-62-6	2-PROPENOIC ACID, 2-METHYL- , METHYL ESTER
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER
000101-77-9	4,4'- DIAMINODIPHEN YLMETHANE
000077-73-6	4,7 METHANO- 1H-INDENE, 3A,4,7,7A- TETRAHYDRO-
000123-42-2	4-HYDROXY-4- METHYL-2- PENTANONE
000075-07-0	ACETALDEHYDE
000064-19-7	ACETIC ACID
000108-05-4	ACETIC ACID ETHENYL ESTER
063450-15-7	ACETIC ACID ETHENYL ESTER, POLYMER
009003-20-7	ACETIC ACID ETHENYLESTER, HOMOPOLYMER
027360-07-2	ACETIC ACID ETHYENYL ESTER, POLYMER
000123-86-4	ACETIC ACID,



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000079-20-9	BUTYL ESTER ACETIC ACID, METHYL ESTER
000074-86-2	ACETYLENE
000107-02-8	ACROLEIN
009019-92-5	ADIPIC ACID- ETHYLENE GLYCOL-TDI POLYMER
013963-57-0	ALUMINUM ACETYLACETON ATE
021645-51-2	ALUMINUM HYDROXIDE
007664-41-7	AMMONIA
007631-86-9	AMORPHOUS SILICA
000062-53-3	ANILINE
016925-25-0	ANTIMONATE(1-) , HEXAFLUORO- , SODIUM
007440-38-2	ARSENIC
000071-43-2	BENZENE
000098-82-8	BENZENE, (1- METHYLETHYL)
001746-23-2	BENZENE, 1-(1,1- DIMETHYLETHY L)-4-ETHENYL
000095-63-6	BENZENE, 1,2,4- TRIMETHYL-
000091-08-7	BENZENE, 1,3 DIISOCYANATO- 2-METHYL
000108-67-8	BENZENE, 1,3,5- TRIMETHYL-
026471-62-5	BENZENE, 1,3- DIISOCYANATO METHYL
000584-84-9	BENZENE, 2,4- DIISOCYANATO- 1-METHYL-
001321-74-0	BENZENE, DIETHENYL-
025340-17-4	BENZENE, DIETHYL-
028106-30-1	BENZENE, ETHENYLETHYL-
000095-47-6	BENZENE,1,2- DIMETHYL
000614-45-9	BENZENECARBO PEROXOICACID,1 ,1- DIMETHYLETHY LESTER
000103-83-3	BENZENEMETHA NAMIDE,N,N- DIMETHYL
025036-25-3	BISPHENOL A, BISPHENOL A DGE POLYMER
025085-75-0	BISPHENOL A, FORMALDEHYDE RESIN



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034762-90-8	BORON, TRICHLORO 9N,N-DIMETHYL- 1-OCTANAMINE)-
000123-72-8	BUTANAL
000106-65-0	BUTANEDIOIC ACID, DIMETHYL ESTER
000110-63-4	BUTANEDIOL, 1,4-
000071-36-3	BUTANOL
000110-17-8	BUTENEDIOIC ACID, 2-
011099-03-9	C.I. SOLVENT BLACK 5
000133-06-2	CAPTAN
000630-08-0	CARBON MONOXIDE
000108-32-7	CARBONIC ACID, CYCLIC PROPYLENE ESTER
067700-42-9	CASHEW, NUTSHELL OIL POLYMER W/ FORMALDEHYDE & PHENOL
068604-06-8	CASTOR OIL, POLYMER W/ ETHYLENEDIAMI NE
007440-50-8	COPPER
001319-77-3	CRESYLIC ACID
000110-82-7	CYCLOHEXANE
000108-94-1	CYCLOHEXANO NE
000131-17-9	DIALLYL PHTHALATE
000075-09-2	DICHLOROMETH ANE
002386-87-0	DICYCLODIEPOX Y CARBOXYLATE
002425-79-8	DIEPOXIDE
068334-30-5	DIESEL FUEL
026254-89-7	DIETHYL BUTYRAL
000111-40-0	DIETHYLENE TRIAMINE
000096-48-0	DIHYDRO 2(3H)- FURANONE
000131-11-3	DIMETHYL PHTHALATE
000067-64-1	DIMETHYL KETONE
000120-61-6	DIMETHYLTEREP HTHALATE
000126-58-9	DIPENTAERYTHR ITOL
034590-94-8	DIPROPYLENE GLYCOL
041638-13-5	METHYL ETHER DIPROPYLENE



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	GYLCOL
	DIGLYCIDYL
	ETHER
002155-71-7	DI-T-BUTYL
	DIPEROXYPHTH
	ALATE
000079-24-3	ETHANE, NITRO-
000111-90-0	ETHANOL, 2- (2-
	ETHOXYETHOXY
)
000112-34-5	ETHANOL, 2-(2-
	BUTOXYETHOXY
)-
000111-42-2	ETHANOL, 2,2'-
	IMINOBIS-
000111-46-6	ETHANOL, 2,2'-
	OXYBIS-
000111-76-2	ETHANOL, 2-
	BUTOXY-
000112-07-2	ETHANOL, 2-
	BUTOXY-,
	ACETATE
000111-15-9	ETHANOL, 2-
	ETHOXY-,
	ACETATE
000124-17-4	ETHANOL,2(2-
	BUTOXYETHOXY
)-,ACETATE
000112-27-6	ETHANOL,2,2'-
	1,2-
	ETHANEDIYLBIS(
	OXY) BIS
068441-17-8	ETHENE,
	HOMOPOLYMER,
	OXIDIZED
025013-15-4	ETHENYLMETHY
	L-BENZENE
000077-99-6	ETHRIOL
000141-78-6	ETHYL ACETATE
000064-17-5	ETHYL ALCOHOL
	(ETHANOL)
000075-23-0	ETHYLAMINE,CO
	MPD WITH
	BORON
	FLUORIDE (BF3)
	(1:1)
000100-41-4	ETHYLBENZENE
000075-21-8	ETHYLENE
	OXIDE
068953-36-6	FATTY ACIDS,
	REACTION
	PRODUCTS W/
	TETRAETHYLEN
	EPENTAMINE
0NY075-20-0	FINE MINERAL
	FIBERS
000050-00-0	FORMALDEHYDE
028453-20-5	FORMALDEHYDE
	, POLYMER W/
	PHENOL
000064-18-6	FORMIC ACID
068476-30-2	FUEL OIL #2
000098-00-0	FURFURYL



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008006-61-9	ALCOHOL
065997-17-3	GASOLINE
001119-40-0	GLASS OXIDE
	GLUTARIC ACID,
	DIMETHYL
	ESTER
000056-81-5	GLYCEROL
007782-42-5	GRAPHITE
008050-09-7	GUM ROSIN
000085-42-7	HEXAHYDRO
	PHTHALIC
	ANHYDRIDE
000110-54-3	HEXANE
000124-04-9	HEXANEDIOIC
	ACID
000627-93-0	HEXANEDIOIC
	ACID, DIMETHYL
	ESTER
026523-14-8	HEXANEDIOIC
	ACID, POLYMER
	W. 1,2
	ETHANEDIOL
000136-52-7	HEXANOIC ACID,
	2-ETHYL
	COBALT 2+
000074-90-8	HYDROCYANIC
	ACID
007647-01-0	HYDROGEN
	CHLORIDE
007722-84-1	HYDROGEN
	PEROXIDE
007681-52-9	HYPOCHLOROUS
	ACID, SODIUM
	SALT
001309-37-1	IRONOXIDE
	(FERRIC OXIDE)
000078-83-1	ISOBUTYL
	ALCOHOL
026952-21-6	ISOOCTANOL
000067-63-0	ISOPROPYL
	ALCOHOL
008008-20-6	KEROSENE
007439-92-1	LEAD
001317-65-3	LIMESTONE
007439-96-5	MANGANESE
000105-08-8	METHANOL, 1,4-
	CYCLOHEXANED
	I-
000067-56-1	METHYL
	ALCOHOL
000078-93-3	METHYL ETHYL
	KETONE
000101-68-8	METHYLENE
	BISPHENYL
	ISOCYANATE
000057-55-6	METHYLETHYL
	GLYCOL
012001-26-2	MICA
000121-44-8	N,N-DIETHYL
	ETHANAMINE
064742-53-6	NAPHTHA
	(PETROLEUM)
	HYDROTREATED



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064741-65-7	LIGHT NAPHTHA (PETROLEUM), HEAVY
064741-41-9	ALKYLATE NAPHTHA (PETROLEUM), HEAVY
064742-94-5	STRAIGHT-RUN NAPHTHA HEAVY
064742-48-9	AROMATIC NAPHTHA HEAVY
064742-95-6	HYDROTREATED (PETROLEUM) NAPHTHA, LIGHT
064742-88-7	AROMATIC NAPHTHA, MEDIUM
000091-20-3	ALIPHATIC NAPHTHALENE
008030-30-6	NAPHTHA
000142-82-5	N-HEPTANE
012710-36-0	NICKEL CARBIDE
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS
001313-99-1	NICKEL OXIDE
007697-37-2	NITRIC ACID
005575-43-9	OCTYLENE GYLCOL, TITANATE (IV)
0NY210-00-0	OXIDES OF NITROGEN
000106-89-8	OXIRANE, (CHLOROMETHY L)
002238-07-5	OXIRANE, 2,2'- OXYBIS(METHYL ENENE) BIS-
002426-08-6	OXIRANE,(BUTO XYMETHYL)- (9CI)
002210-79-9	OXIRANE,[(2- METHYLPHENOX Y),METHYL]
003101-60-8	OXIRANE,[[4-(1,1- DIMETHYLETHY L)PHENOXY]MET HYL]
010028-15-6	OZONE
0NY075-00-0	PARTICULATES
006228-26-8	PENTAERYTHRIT OL LINEAR FORMAL
000112-57-2	PENTAMINE, TETRAETHYLEN E
000080-43-3	PEROXIDE , BISIIMETHYL-1- PHENYLETHYL
000094-36-0	PEROXIDE,



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000108-95-2	DIBENZOYL
068610-56-0	PHENOL
	PHENOL 4,4'-(1-
	METHYLETHYLI
	DENE)BIS-,
	POLYMER
000108-39-4	PHENOL, 3-
	METHYL
000080-46-6	PHENOL, 4-(1,1-
	DIMETHYLPROP
	YL)-
000080-05-7	PHENOL, 4,4'-(1-
	METHYLETHYLI
	DENE)BIS-
000150-76-5	PHENOL, 4-
	METHOXY-
000106-44-5	PHENOL, 4-
	METHYL
001300-71-6	PHENOL,
	DIMETHYL-
025429-37-2	PHENOL, EHTYL-
028064-14-4	PHENOL,
	POLYMER WITH
	FORMALDEHYDE
	, GLYCIDYL
	ETHER
026998-80-1	PHENOL,
	TRIMETHYL
009003-35-4	PHENOL,POLYM
	ER WITH
	FORMALDEHYDE
	MIX
025068-38-6	PHENOXY RESIN
017084-13-8	PHOSPHATE(1-),
	HEXAFLUORO-,
	POTASIMUM
007664-38-2	PHOSPHORIC
	ACID
000078-40-0	PHOSPHORIC
	ACID, TRIETHYL
	ESTER
000101-02-0	PHOSPHORUS
	ACID,TRIPHENYL
	ESTER
0NY075-00-5	PM-10
025322-68-3	POLYETHYLENE
	GLYCOL
009003-53-6	POLYSTYRENE
063148-64-1	POLYVINYL
	FORMAL RESIN
007789-23-3	POTASSIUM
	FLUORIDE
000075-56-9	PROPANE, 1,2-
	EPOXY-
000079-46-9	PROPANE, 2-
	NITRO
000122-60-1	PROPANE,1,2-
	EPOXY-3-
	PHENOXY-
000071-23-8	PROPANOL
025265-71-8	PROPANOL,
	OXYBIS
000107-13-1	PROPENENITRILE



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000103-11-7	PROPENOIC ACID, 2- ETHYLHEXYL ESTER
014808-60-7	QUARTZ
000106-51-4	QUINONE
008050-31-5	RESIN ACIDS & ROSIN ACID, ESTERS W/ GLYCEROL
068152-50-1	ROSIN, POLYMER W/ DEG AND PENTAERYTHRIT OL
009000-59-3	SHELLAC
006843-66-9	SILANE, DIMETHOXYDIP HENYL-
000078-08-0	SILANE,ETHENY LTRIETHOXY-
000078-10-4	SILICIC ACID, TETRAETHYL ESTER
112945-52-5	SILICON DIOXIDE, AMORPHOUS
067762-90-7	SILICONIZED SILICA
007440-22-4	SILVER
001310-73-2	SODIUM HYDROXIDE
064742-89-8	SOLVENT NAPTHA, LIGHT ALIPHATIC
008052-41-3	STODDARD SOLVENT
000100-42-5	STYRENE
007446-09-5	SULFUR DIOXIDE
007446-11-9	SULFUR TRIOXIDE
007664-93-9	SULFURIC ACID
014807-96-6	TALC
000085-43-8	TETRAHYDROPH THALIC ANHYDRIDE
007328-97-4	TETRAPHENYLO ETHANE, EPICHLOROHYD RIN EPOXY RESIN
013463-67-7	TITANIUM DIOXIDE
000108-88-3	TOLUENE
0NY100-00-0	TOTAL HAP
000126-73-8	TRIBUTYL PHOSPHATE
000112-24-3	TRIETHYLENE TETRAMINE
000552-30-7	TRIMELLITIC ANHYDRIDE
000527-60-6	TRIMETHYL PHENOL, 2,4,6-
000078-24-0	TRIPENTAERYTH



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008032-32-4	RITOL VM & P NAPHTHA	
0NY998-00-0	VOC	78000
013983-17-0	WOLLASTONITE	
001330-20-7	XYLENE, M, O & P MIXT.	
000106-42-3	XYLENE, PARA-	
007440-66-6	ZINC	
017501-44-9	ZIRCONIUM ACETONATE	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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 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 B: 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 C: 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 D: 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 E: 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 F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR



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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 G: 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 H: 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 I: 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 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 J: 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.



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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.

Item K: Permit Exclusion - ECL 19-0305

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

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

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

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.



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- (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_02

**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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	185	Powers and Duties of the Department with respect to air pollution control
1-14CC1/-/CC4/KISS2	40CFR 60-VVV.740(b)	103	Standards of performance for



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FACILITY	40CFR 60-VVV.742(a)	1	-8	polymeric coating of supporting substrates facilities Standards of performance for polymeric coating of supporting substrates facilities -
FACILITY	40CFR 60-VVV.742(b)(2)	1	-9	standards for VOC Standards of performance for polymeric coating of supporting substrates facilities -
FACILITY	40CFR 60-VVV.742(c)	1	-10	standards for VOC Standards of performance for polymeric coating of supporting substrates facilities -
FACILITY	40CFR 60-VVV.743(b)	1	-11	standards for VOC Standards of performance for polymeric coating of supporting substrates facilities -
FACILITY	40CFR 60-VVV.743(c)	1	-12	compliance provisions Standards of performance for polymeric coating of supporting substrates facilities -
FACILITY	40CFR 60-VVV.744	1	-13	compliance provisions Standards of performance for polymeric coating of supporting substrates facilities -
FACILITY	40CFR 60-VVV.744(a)	1	-14	monitoring requirements Standards of performance for polymeric coating of supporting substrates facilities -
1-14CC1/-/CC4/KISS2	40CFR 60-VVV.744(b)	104		monitoring requirements Standards of performance for polymeric coating of supporting substrates facilities -
FACILITY	40CFR 60-VVV.744(e)	1	-15	monitoring requirements Standards of performance for polymeric coating of supporting substrates facilities -
FACILITY	40CFR 60-VVV.744(h)	1	-16	monitoring requirements Standards of performance for polymeric coating of



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FACILITY	40CFR 60-VVV.745	1	-17	supporting substrates facilities - monitoring requirements Standards of performance for polymeric coating of supporting substrates facilities - test methods and procedures
FACILITY	40CFR 60-VVV.745(a)	1	-18	Standards of performance for polymeric coating of supporting substrates facilities - test methods and procedures
FACILITY	40CFR 60-VVV.745(b)	1	-19	Standards of performance for polymeric coating of supporting substrates facilities - test methods and procedures
FACILITY	40CFR 60-VVV.747	1	-20	Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
FACILITY	40CFR 60-VVV.747(a)	1	-21	Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
1-14CC1/-/CC4/KISS2	40CFR 60-VVV.747(b)	105		Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
1-14CC1/-/CC4/KISS2	40CFR 60-VVV.747(c)	106		Polymeric coating of supporting substrates facilities - reporting and recordkeeping requirements
FACILITY	40CFR 60-VVV.747(d)(4)	1	-22	Polymeric coating of supporting substrates - reporting and recordkeeping - monitoring incinerator combustion gas temperature
FACILITY	40CFR 60-VVV.747(d)(6)	1	-23	Polymeric coating of supporting substrates - reporting and recordkeeping - monitoring vapor capture
FACILITY	40CFR 63-A.10(b)(2)	37		



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FACILITY	40CFR 63-A.10(c)	38	
FACILITY	40CFR 63-DDDDD	62	Boilers and Process Heaters Major Source
1-33001	40CFR 63-F.105	149	NESHAP rule Subpart F - HON NESHAP - maintenance wastewater requirements
FACILITY	40CFR 63-FFFF.2445(b)	63	Miscellaneous Organic Chemical Mfg NESHAP - Compliance Date for existing source
FACILITY	40CFR 63-FFFF.2460(b)	64	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Group status
FACILITY	40CFR 63-FFFF.2460(c)	65, 66	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Batch Process Vents - Exceptions to Subpart SS
FACILITY	40CFR 63-FFFF.2465(b)	67	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - uncontrolled hydrogen halide & halogen HAP emissions.
FACILITY	40CFR 63-FFFF.2480	68	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
FACILITY	40CFR 63-FFFF.2485	69, 70	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Req'ts for wastewater streams & liquid streams in open systems.
FACILITY	40CFR 63-FFFF.2520	71, 72	Miscellaneous Organic Chemical Mfg NESHAP - Reporting
FACILITY	40CFR 63-FFFF.2525	73	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Recordkeeping Requirements
FACILITY	40CFR 63-FFFF.2535(1)	74	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Applicability of process units included in a process unit group
FACILITY	40CFR 63-G.132(f)	39	HON - process wastewater provisions - general
FACILITY	40CFR 63-G.132(g)	40	HON - process wastewater provisions - general
FACILITY	40CFR 63-G.133(a)(1)	41	HON - process



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FACILITY	40CFR 63-G.133(b)(1)	42	wastewater provisions - wastewater tanks HON - process
FACILITY	40CFR 63-G.133(f)	43	wastewater provisions - wastewater tanks HON - process
FACILITY	40CFR 63-G.135(b)	44	wastewater provisions - wastewater tanks HON - process
FACILITY	40CFR 63-G.135(c)	45	wastewater provisions - containers HON - process
FACILITY	40CFR 63-G.135(e)	46	wastewater provisions - containers HON - process
FACILITY	40CFR 63-G.135(f)	47	wastewater provisions - containers HON - process
FACILITY	40CFR 63-G.140	48	wastewater provisions - containers HON - process
FACILITY	40CFR 63-G.143(a)	49	wastewater provisions - inspection and monitoring of operations HON - process
FACILITY	40CFR 63-G.146(c)	50	wastewater provisions - inspections and monitoring of operations HON - process
FACILITY	40CFR 63-G.147(b)	51	wastewater provisions - reporting HON - process
FACILITY	40CFR 63-G.147(f)	52	wastewater provisions - recordkeeping HON - process
FACILITY	40CFR 63-G.148(d)	53	wastewater provisions - recordkeeping Leak inspection provisions
FACILITY	40CFR 63-G.148(e)	54	Leak inspection provisions
FACILITY	40CFR 63-G.148(g)	55	Leak inspection provisions
FACILITY	40CFR 63-G.148(h)	56	Leak inspection provisions
FACILITY	40CFR 63-G.148(i)	57	Leak inspection provisions
1-33001/-/MCM	40CFR 63- HHHHH.8000(a)	165	Miscellaneous Coating Mfg. NESHAP - General Requirements
1-33001/-/MCM	40CFR 63- HHHHH.8000(b)	166	Miscellaneous Organic Coating Mfg. NESHAP - General Requirements
1-33001/-/MCM	40CFR 63- HHHHH.8000(d)	167, 168	Miscellaneous Organic Coating Mfg. NESHAP - Exceptions
1-33001/-/MCM	40CFR 63- HHHHH.8005(a)	169, 170, 171, 172, 173, 174	Miscellaneous Organic Coating Mfg. NESHAP - Emission Limits
1-33001/-/MCM	40CFR 63- HHHHH.8005(d)	175	Miscellaneous Organic Coating Mfg. NESHAP - Initial Compliance



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1-33001/-/MCM	40CFR 63- HHHHH.8005(e)	176	Demonstration Miscellaneous Organic Coating Mfg - Establishing operating limits
1-33001/-/MCM	40CFR 63- HHHHH.8005(g)	177	Miscellaneous Coating Mfg. NESHAP - Flow Indicators
1-33001/-/MCM	40CFR 63-HHHHH.8015	178	Miscellaneous Coating Mfg. NESHAP - Equipment Leaks
1-33001/-/MCM	40CFR 63- HHHHH.8050(d)	179	Misc. Organic Coating Mfg. NESHAP - Process vessel emissions averaging continuous compliance
1-33001/-/MCM	40CFR 63-HHHHH.8055	180	Misc. Organic Coating Mfg. NESHAP - Coating products weight percent HAP limit option
1-33001/-/MCM	40CFR 63- HHHHH.8075(e)	181	Miscellaneous Coating Mfg. NESHAP - Compliance reports
1-33001/-/MCM	40CFR 63-HHHHH.8080	182	Misc. Organic Coating Mfg. NESHAP - recordkeeping
1-14CC1/-/CC1	40CFR 63- JJJJ.3320(b)(2)	92	Paper and Other Web Coating NESHAP - emission standard based on mass of coating materials
1-14CC1/-/CC4	40CFR 63- JJJJ.3320(b)(2)	97	Paper and Other Web Coating NESHAP - emission standard based on mass of coating materials
1-14CC1/-/CC1	40CFR 63- JJJJ.3320(b)(3)	93	Paper and Other Web Coating NESHAP - Emission standard - mass of coating solids option
1-14CC1/-/CC4	40CFR 63- JJJJ.3320(b)(3)	98	Paper and Other Web Coating NESHAP - Emission standard - mass of coating solids option
FACILITY	40CFR 63-JJJJ.3350(f)	75	Paper and Other Web Coating NESHAP - Monitoring of capture systems
FACILITY	40CFR 63-JJJJ.3360(c)	76, 77	Paper and Other Web Coating NESHAP - Determination of organic HAP content
1-14CC1/-/CC1	40CFR 63-JJJJ.3360(c)	94	Paper and Other Web Coating NESHAP - Determination of organic HAP content
1-14CC1/-/CC4	40CFR 63-JJJJ.3360(c)	99	Paper and Other Web Coating NESHAP - Determination of organic HAP content
FACILITY	40CFR 63-JJJJ.3370(b)	78	Paper and Other Web



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1-14CC1/-/CC1	40CFR 63-JJJJ.3370(b)	95	Coating NESHAP - Requirements for showing compliance Paper and Other Web Coating NESHAP - Requirements for showing compliance Paper and Other Web Coating NESHAP - Requirements for showing compliance Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials
1-14CC1/-/CC4	40CFR 63-JJJJ.3370(b)	100, 101	Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials
1-14CC1/-/CC1	40CFR 63-JJJJ.3370(c)	96	Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials
1-14CC1/-/CC4	40CFR 63-JJJJ.3370(c)	102	Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials
FACILITY	40CFR 63-JJJJ.3370(e)	79	Paper and Other Web Coating NESHAP - Compliance Demonstration - 95/98% control option
FACILITY	40CFR 63-JJJJ.3400(c)	80	Paper and Other Web Coating NESHAP - reporting - semiannual compliance report
FACILITY	40CFR 63-JJJJ.3400(g)	81	Paper and Other Web Coating NESHAP - reporting - startup/shutdown/malf unction reports
FACILITY	40CFR 63-JJJJ.3410	82	Paper and Other Web Coating NESHAP - Recordkeeping requirements
FACILITY	40CFR 63-0000	1 -24	Printing, Coating, and Dyeing of Fabrics
FACILITY	40CFR 63-0000.4291(a)	1 -25	Fabric Printing, Coating, Dyeing NESHAP - Compliance options for web coating and printing
1-14CC1/-/CC5	40CFR 63-0000.4291(a)	107	Fabric Printing, Coating, Dyeing NESHAP - Compliance options for web coating and printing
1-14NC1/-/CC2	40CFR 63-0000.4291(a)	111	Fabric Printing, Coating, Dyeing NESHAP - Compliance options for web coating and printing
FACILITY	40CFR 63-0000.4292(b)	1 -26	Fabric Coating/Printing/Dyeing NESHAP - Operating Limits
1-14NC1/-/NC1	40CFR 63-0000.4293(b)	117	Fabric



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FACILITY	40CFR 63-0000.4300(a)	1	-27	Coating/Printing/Dyeing NESHAP - Work Practice Standards NESHAP for Coating, Printing, Dyeing of Fabrics and Other Textiles - Emission Limits
FACILITY	40CFR 63-0000.4300(b)	1	-28	NESHAP for Coating, Printing, Dyeing of Fabrics and Other Textiles - General Requirements
FACILITY	40CFR 63-0000.4300(c)	1	-29	NESHAP for Coating, Printing, and Dyeing of Fabrics and Other Textiles - General Requirements
FACILITY	40CFR 63-0000.4311(a)	84		Fabric Coating/Printing/Dyeing NESHAP - Reporting
FACILITY	40CFR 63-0000.4312	1	-30	Fabric Coating/Printing/Dyeing NESHAP - Recordkeeping
FACILITY	40CFR 63-0000.4313	1	-31	Fabric Coating/Printing/Dyeing NESHAP - Record retention
FACILITY	40CFR 63-0000.4351(d)	1	-32	Fabric Coating/Printing/Dyeing NESHAP - Overall Control Efficiency and Oxidizer Outlet Concentration - Initial Compliance
FACILITY	40CFR 63-0000.4352	1	-33	Fabric Coating/Printing/Dyeing NESHAP - Overall Control Efficiency and Oxidizer Outlet Concentration Option-Cont. Compliance
FACILITY	40CFR 63-0000.4364(a)	1	-34	Fabric Coating/Printing/Dyeing NESHAP - Continuous Parametric Monitoring System Requirements
FACILITY	40CFR 63-0000.4364(b)	1	-35	Fabric Coating/Printing/Dyeing NESHAP - Capture System Bypass Line requirements
FACILITY	40CFR 63-0000.4364(c)	1	-36	Fabric Coating/Printing/Dyeing NESHAP - Oxidizer requirements
FACILITY	40CFR 63-0000.4364(e)	1	-37	Fabric Coating/Printing/Dyeing NESHAP - Capture system monitoring
FACILITY	40CFR 63-PPPP.4493(b)	1	-38	Plastic Parts & Products Surface



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1-33001/-/MCM	40CFR 63-R.424	150	Coating NESHAP - Work practice standards
1-33001/-/MCM	40CFR 63-R.428	151	Subpart R standard: Equipment leaks
1-33001/-/MCM	40CFR 63-SS.982(c)(2)	152	Subpart R standard: Reporting and recordkeeping
1-33001/-/MCM	40CFR 63-SS.990(a)	153	National Emission Standards for Closed Vent Systems - Closed vent systems with nonflare control devices
1-33001/-/MCM	40CFR 63-SS.990(c)(1)	154	NESHAP For Closed Vent Systems, Control Devices, etc. - Absorbers & Condensers as Control Devices - equipment and operation
1-33001/-/MCM	40CFR 63-SS.990(c)(2)	155	NESHAP for Closed Vent Systems, Control Devices, etc. - Monitoring Requirements for Absorbers
1-33001/-/MCM	40CFR 63-SS.996(c)	156	NESHAP for Closed Vent Systems, Control Devices, etc. - Absorbers, Condensers as Control
1-33001/-/MCM	40CFR 63-SS.996(d)	157	NESHAP for Closed Vent Systems, Control Devices, etc. - Continuous Monitoring Parameter Systems
1-33001/-/MCM	40CFR 63-SS.998(a)(2)	158	NESHAP for Closed Vent Systems & Control Devices - Alternatives to Monitoring Requirements
1-33001/-/MCM	40CFR 63-SS.998(b)	159	Recordkeeping Requirements
1-33001/-/MCM	40CFR 63-SS.998(c)(1)	160	Recordkeeping Requirements
1-33001/-/MCM	40CFR 63-SS.998(c)(3)	161	NESHAP for Closed Vent Systems & Control Devices - Recordkeeping Provisions - nonflare control & recovery device - monitoring
1-33001/-/MCM	40CFR 63-SS.998(d)	162	NESHAP for Closed Vent Systems & Control Devices - Recordkeeping Provisions - nonflare control device - other control devices
1-33001/-/MCM	40CFR 63-SS.999(c)	163	Recordkeeping Requirements
			Reporting Requirements



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1-33001/-/MCM	40CFR 63-SS.999(d)	164	NESHAP for Closed Vent Systems, Control Devices, etc. - Requests for Monitoring Alternatives
FACILITY	40CFR 63-UU.1036	58	Alternative means of emission limitation: Batch processes
FACILITY	40CFR 63-UU.1038(b)	59	NESHAP for Equipment Leaks - Control Level 2 - Recordkeeping - General equipment leak records
FACILITY	40CFR 63-UU.1038(c)(8)	60	Recordkeeping Requirements
FACILITY	40CFR 63-UU.1039	61	Reporting requirements
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.11(a)	187	Temporary Emission Sources
FACILITY	6NYCRR 201-1.15	188	Requirement to Commence Construction
FACILITY	6NYCRR 201-1.4	186	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 87, 88	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16, 1 -1	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and



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FACILITY	6NYCRR 201-6.4(d)(4)	22	Noncompliance Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7.1	1 -2	Emission Capping in Facility Permits
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	23	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	189	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212.10(c)(4)(iii)	26	General Process Emission Sources - NOx and VOC RACT required at major facilities
1-14CC1	6NYCRR 212.3(b)	89	General Process Emission Sources - emissions from existing emission sources
1-14NC1	6NYCRR 212.3(b)	109	General Process Emission Sources - emissions from existing emission sources
FACILITY	6NYCRR 212.6(a)	25	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 212-2.4(b)	1 -4	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 228-1.1(a)(1)	27	Table 1- Coating line categories
1-14CC1	6NYCRR 228-1.3(a)	90	Surface Coating General Requirements- Opacity
1-14NC1	6NYCRR 228-1.3(a)	110	Surface Coating General Requirements- Opacity
FACILITY	6NYCRR 228-1.3(b)(1)	28	General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3(b)(2)	29	General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3(c)	30	Surface Coating General Requirements- Prohibitions
FACILITY	6NYCRR 228-1.3(d)	31	Surface Coating General Requirements- Handling, storage and



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FACILITY	6NYCRR 228-1.4(d)	32	disposal
FACILITY	6NYCRR 228-1.4(d)(2)	33	Class D Coating Lines
			VOC limits for
			magnetic wire, metal
			can, coil, vinyl and
			fabric
1-14CC1	6NYCRR 228-1.4(d)(2)	91	VOC limits for
			magnetic wire, metal
			can, coil, vinyl and
			fabric
1-14CC1/-/CC5/01531	6NYCRR 228-1.4(d)(2)	108	VOC limits for
			magnetic wire, metal
			can, coil, vinyl and
			fabric
FACILITY	6NYCRR 228-1.4(d)(3)	1 -5	VOC limits for Paper
FACILITY	6NYCRR 228-1.5(a)	1 -6	Film & Foil coatings
FACILITY	6NYCRR 228-1.5(b)	1 -7	Requirements of VOC
FACILITY	6NYCRR 228-1.6(a)	35	controls
FACILITY	6NYCRR 228-1.6(c)	36	Natural gas
1-TANKS	6NYCRR 229.3(e)(2)(v)	183	incineration of VOCs
2-TANKS	6NYCRR 229.3(e)(2)(v)	184	Surface coating VOC
			analysis.
			Surface coating
			access for sampling
			Volatile organic
			liquid storage tanks
			Volatile organic
			liquid storage tanks

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



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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 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)



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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 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 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.

40 CFR Part 68

This Part lists the regulated substances and there applicability thresholds and sets the requirements for



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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, VON ROLL USA INC has been determined to be subject to the following regulations:

40 CFR 60.740 (b)

40 CFR 60.742 (a)

40 CFR 60.742 (b) (2)

40 CFR 60.742 (c)

40 CFR 60.743 (b)

40 CFR 60.743 (c)

40 CFR 60.744

40 CFR 60.744 (a)

40 CFR 60.744 (b)



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40 CFR 60.744 (e)

40 CFR 60.744 (h)

40 CFR 60.745

40 CFR 60.745 (a)

40 CFR 60.745 (b)

40 CFR 60.747

40 CFR 60.747 (a)

40 CFR 60.747 (b)

40 CFR 60.747 (c)

40 CFR 60.747 (d) (4)

Monitoring thermal incinerator combustion gas temperature for all 3-hour periods (during actual coating operations) during which the average combustion temperature of the device is > 28 C below the average combustion temperature of the device during the most recent stack test that showed compliance.

40 CFR 60.747 (d) (6)

Monitoring for total enclosure or vapor capture systems, all 3-hour periods (during actual coating operations) during which the average total enclosure or vapor capture system monitor readings vary by 5% or more from the average value measured during the most successful compliance test.

40 CFR 63.10 (b) (2)



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40 CFR 63.10 (c)

40 CFR 63.1036

Conditions under this section provide alternatives to the leak detection and repair standards of sections 63.1025 through 63.1033. They also describe the means of tracking changes of operation between the alternatives.

40 CFR 63.1038 (b)

40 CFR 63.1038 (c) (8)

40 CFR 63.1039

40 CFR 63.105

40 CFR 63.132 (f)

40 CFR 63.132 (g)

40 CFR 63.133 (a) (1)

40 CFR 63.133 (b) (1)

40 CFR 63.133 (f)

40 CFR 63.135 (b)



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40 CFR 63.135 (c)

40 CFR 63.135 (e)

40 CFR 63.135 (f)

40 CFR 63.140

40 CFR 63.143 (a)

40 CFR 63.146 (c)

40 CFR 63.147 (b)

40 CFR 63.147 (f)

40 CFR 63.148 (d)

This condition requires the facility to repair any leaks found on a closed-vent or vapor collection system that is subject to the HON rule. This condition helps minimize the fugitive losses of organic hazardous air pollutants by ensuring that the facility repairs all leaks within 15 days. Adequate records also are required in order to keep track of the leaks in these systems.

40 CFR 63.148 (e)

This condition allows a facility that found leaks in a vapor collection system or closed-vent system to delay the repair of these leaks. The leaks may be delayed if doing so would create more emissions of organic hazardous air pollutants than otherwise would result from leaving the leak alone.

40 CFR 63.148 (g)

40 CFR 63.148 (h)



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40 CFR 63.148 (i)

40 CFR 63.2445 (b)

This regulation requires that existing sources must comply with the requirements for this subpart no later than May 10, 2008.

40 CFR 63.2460 (b)

40 CFR 63.2460 (c)

40 CFR 63.2465 (b)

40 CFR 63.2480

40 CFR 63.2485

40 CFR 63.2520

40 CFR 63.2525

40 CFR 63.2535 (l)

This regulation sets forth the requirements for process unit groups that are subject to the miscellaneous organic manufacturing regulation under 40 CFR 63 Subpart FFFF.



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40 CFR 63.3320 (b) (2)

This condition reduces the emissions of hazardous air pollutants by requiring the facility to meet an emission limit for organic HAP that are emitted from the coating processes. The facility must not emit more than 4% of the mass of the coating materials as organic HAP for existing sources and 1.6% for new sources.

The facility will prove that it is meeting this limit during the initial compliance demonstration that is also required as part of this subpart.

40 CFR 63.3320 (b) (3)

This condition reduces the emissions of hazardous air pollutants by requiring the facility to meet an emission limit for organic HAP that are emitted from the coating processes. The facility must not emit more than 20% of the mass of the coating solids as organic HAP for existing sources and 8% for new sources.

The facility will prove that it is meeting this limit during the initial compliance demonstration that is also required as part of this subpart.

40 CFR 63.3350 (f)

40 CFR 63.3360 (c)

This condition requires the facility to calculate the portion of the coating that is organic hazardous air pollutants and spells out which methods are allowable to calculate the content. This condition will ensure that the facility is calculating their emissions of organic HAP in a consistent and easily understandable manner when determining whether they are meeting the emission limits in this subpart.

40 CFR 63.3370 (b)

40 CFR 63.3370 (c)

40 CFR 63.3370 (e)

40 CFR 63.3400 (c)

40 CFR 63.3400 (g)



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40 CFR 63.3410

40 CFR 63.424

40 CFR 63.428

40 CFR 63.4291 (a)

40 CFR 63.4292 (b)

40 CFR 63.4293 (b)

40 CFR 63.4300 (a)

40 CFR 63.4300 (b)

40 CFR 63.4300 (c)

This section outlines the general requirements for facilities using an emission capture system and add-on control device to comply with the requirements of 40 CFR 63 Subpart OOOO.

40 CFR 63.4311 (a)

40 CFR 63.4312

40 CFR 63.4313



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40 CFR 63.4351 (d)

40 CFR 63.4352

40 CFR 63.4364 (a)

40 CFR 63.4364 (b)

40 CFR 63.4364 (c)

This regulation sets forth the monitoring requirements for oxidizers used to meet the emissions standards for facilities that are subject to the NESHAP for Printing, Coating and Dyeing of fabrics and other textiles.

40 CFR 63.4364 (e)

This regulation requires that a site specific monitoring plan be developed for the capture system used at the facility.

40 CFR 63.4493 (b)

40 CFR 63.8000 (a)

40 CFR 63.8000 (b)

40 CFR 63.8000 (d)

This section describes exceptions to other parts of 40 CFR 63 for facilities that are subject to 40 CFR 63 Subpart HHHHH.

40 CFR 63.8005 (a)



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40 CFR 63.8005 (d)

40 CFR 63.8005 (e)

40 CFR 63.8005 (g)

40 CFR 63.8015

40 CFR 63.8050 (d)

40 CFR 63.8055

40 CFR 63.8075 (e)

40 CFR 63.8080

40 CFR 63.982 (c) (2)

40 CFR 63.990 (a)

40 CFR 63.990 (c) (1)



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40 CFR 63.990 (c) (2)

40 CFR 63.996 (c)

40 CFR 63.996 (d)

40 CFR 63.998 (a) (2)

40 CFR 63.998 (b)

40 CFR 63.998 (c) (1)

40 CFR 63.998 (c) (3)

40 CFR 63.998 (d)

40 CFR 63.999 (c)

40 CFR 63.999 (d)

40 CFR Part 63, Subpart DDDDD

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP emissions. It also establishes requirements to demonstrate initial and continuous



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compliance with the emission limits and work practice standards.

40 CFR Part 63, Subpart OOOO

6 NYCRR 201-1.11 (a)

Criteria for temporary emission sources.

6 NYCRR 201-1.15

The existence of a valid permit shall not be construed as authorizing construction if construction is not commenced within 18 months after the date of permit issuance, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time as determined by the department. Up to an 18-month extension may be granted by the department upon a showing of good cause in a written request by the facility owner or operator. The department may suspend, modify or revoke the permit or registration pursuant to Part 621 of this Title if construction or modification has not commenced within 18 months of issuance of such permit or registration, or construction has been discontinued for a period of more than 18 months at any point after issuance of such permit or registration.

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 Title V or other applicable requirements using federally enforceable permit conditions permit.

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 212.10 (c) (4) (iii)

This section allows source owners who cannot achieve an overall removal efficiency of 81% or use coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the Department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the Department.



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6 NYCRR 212.3 (b)

This rule requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

6 NYCRR 212.6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6 NYCRR 212-2.4 (b)

6 NYCRR 228-1.1 (a) (1)

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) (1)

This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (b) (2)

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.



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6 NYCRR 228-1.3 (d)

This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.4 (d)

Surface coating VOC limits

6 NYCRR 228-1.4 (d) (2)

6 NYCRR 228-1.4 (d) (3)

6 NYCRR 228-1.5 (a)

6 NYCRR 228-1.5 (b)

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.

6 NYCRR 228-1.6 (c)

This citation permits Department personnel to enter a facility at reasonable hours for the purpose of collecting samples to verify compliance with VOC content limit requirements.

6 NYCRR 229.3 (e) (2) (v)

This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.



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Compliance Certification

Summary of monitoring activities at VON ROLL USA INC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	1-8	intermittent emission testing
FACILITY	1-9	record keeping/maintenance procedures
FACILITY	1-10	record keeping/maintenance procedures
FACILITY	1-11	record keeping/maintenance procedures
FACILITY	1-12	record keeping/maintenance procedures
FACILITY	1-13	record keeping/maintenance procedures
FACILITY	1-14	record keeping/maintenance procedures
1-14CC1/-/CC4/KISS2	104	record keeping/maintenance procedures
FACILITY	1-15	monitoring of process or control device parameters as surrogate
FACILITY	1-16	record keeping/maintenance procedures
FACILITY	1-17	record keeping/maintenance procedures
FACILITY	1-18	record keeping/maintenance procedures
FACILITY	1-19	record keeping/maintenance procedures
FACILITY	1-20	record keeping/maintenance procedures
FACILITY	1-21	record keeping/maintenance procedures
1-14CC1/-/CC4/KISS2	105	record keeping/maintenance procedures
1-14CC1/-/CC4/KISS2	106	record keeping/maintenance procedures
FACILITY	1-22	record keeping/maintenance procedures
FACILITY	1-23	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
1-33001	149	record keeping/maintenance procedures
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
FACILITY	65	record keeping/maintenance procedures
FACILITY	66	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures
FACILITY	68	record keeping/maintenance procedures
FACILITY	69	record keeping/maintenance procedures
FACILITY	70	record keeping/maintenance procedures
FACILITY	71	record keeping/maintenance procedures
FACILITY	72	record keeping/maintenance procedures
FACILITY	73	record keeping/maintenance procedures
FACILITY	74	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
FACILITY	44	record keeping/maintenance procedures
FACILITY	45	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
FACILITY	48	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
FACILITY	51	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	57	record keeping/maintenance procedures
1-33001/-/MCM	167	monitoring of process or control device parameters as surrogate



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1-33001/-/MCM	168	record keeping/maintenance procedures
1-33001/-/MCM	169	record keeping/maintenance procedures
1-33001/-/MCM	170	intermittent emission testing
1-33001/-/MCM	171	monitoring of process or control device parameters as surrogate
1-33001/-/MCM	172	record keeping/maintenance procedures
1-33001/-/MCM	173	monitoring of process or control device parameters as surrogate
1-33001/-/MCM	174	monitoring of process or control device parameters as surrogate
1-33001/-/MCM	175	record keeping/maintenance procedures
1-33001/-/MCM	176	record keeping/maintenance procedures
1-33001/-/MCM	178	record keeping/maintenance procedures
1-33001/-/MCM	179	record keeping/maintenance procedures
1-33001/-/MCM	180	record keeping/maintenance procedures
1-33001/-/MCM	181	record keeping/maintenance procedures
1-33001/-/MCM	182	record keeping/maintenance procedures
1-14CC1/-/CC1	92	record keeping/maintenance procedures
1-14CC1/-/CC4	97	record keeping/maintenance procedures
1-14CC1/-/CC1	93	record keeping/maintenance procedures
1-14CC1/-/CC4	98	record keeping/maintenance procedures
FACILITY	75	record keeping/maintenance procedures
FACILITY	76	record keeping/maintenance procedures
FACILITY	77	record keeping/maintenance procedures
1-14CC1/-/CC1	94	record keeping/maintenance procedures
1-14CC1/-/CC4	99	record keeping/maintenance procedures
FACILITY	78	record keeping/maintenance procedures
1-14CC1/-/CC1	95	record keeping/maintenance procedures
1-14CC1/-/CC4	100	record keeping/maintenance procedures
1-14CC1/-/CC4	101	record keeping/maintenance procedures
1-14CC1/-/CC1	96	record keeping/maintenance procedures
1-14CC1/-/CC4	102	record keeping/maintenance procedures
FACILITY	79	record keeping/maintenance procedures
FACILITY	80	record keeping/maintenance procedures
FACILITY	81	record keeping/maintenance procedures
FACILITY	82	record keeping/maintenance procedures
FACILITY	1-24	intermittent emission testing
FACILITY	1-25	monitoring of process or control device parameters as surrogate
1-14CC1/-/CC5	107	record keeping/maintenance procedures
1-14NC1/-/CC2	111	record keeping/maintenance procedures
FACILITY	1-26	monitoring of process or control device parameters as surrogate
1-14NC1/-/NC1	117	record keeping/maintenance procedures
FACILITY	1-27	record keeping/maintenance procedures
FACILITY	1-28	record keeping/maintenance procedures
FACILITY	1-29	record keeping/maintenance procedures
FACILITY	84	record keeping/maintenance procedures
FACILITY	1-30	record keeping/maintenance procedures
FACILITY	1-31	record keeping/maintenance procedures
FACILITY	1-32	record keeping/maintenance procedures
FACILITY	1-33	record keeping/maintenance procedures
FACILITY	1-34	record keeping/maintenance procedures
FACILITY	1-35	record keeping/maintenance procedures
FACILITY	1-36	record keeping/maintenance procedures
FACILITY	1-37	record keeping/maintenance procedures
FACILITY	1-38	record keeping/maintenance procedures
1-33001/-/MCM	150	record keeping/maintenance procedures
1-33001/-/MCM	151	record keeping/maintenance procedures
1-33001/-/MCM	152	record keeping/maintenance procedures
1-33001/-/MCM	153	record keeping/maintenance procedures
1-33001/-/MCM	154	record keeping/maintenance procedures
1-33001/-/MCM	155	monitoring of process or control device parameters as surrogate



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1-33001/-/MCM	156	record keeping/maintenance procedures
1-33001/-/MCM	157	record keeping/maintenance procedures
1-33001/-/MCM	158	record keeping/maintenance procedures
1-33001/-/MCM	159	record keeping/maintenance procedures
1-33001/-/MCM	160	record keeping/maintenance procedures
1-33001/-/MCM	161	record keeping/maintenance procedures
1-33001/-/MCM	162	record keeping/maintenance procedures
1-33001/-/MCM	163	record keeping/maintenance procedures
1-33001/-/MCM	164	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
FACILITY	60	record keeping/maintenance procedures
FACILITY	61	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	1-3	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	26	record keeping/maintenance procedures
1-14CC1	89	intermittent emission testing
1-14NC1	109	intermittent emission testing
FACILITY	25	record keeping/maintenance procedures
FACILITY	1-4	intermittent emission testing
FACILITY	27	record keeping/maintenance procedures
1-14CC1	90	monitoring of process or control device parameters as surrogate
1-14NC1	110	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures
FACILITY	32	work practice involving specific operations
FACILITY	33	work practice involving specific operations
1-14CC1	91	monitoring of process or control device parameters as surrogate
1-14CC1/-/CC5/01531	108	monitoring of process or control device parameters as surrogate
FACILITY	1-5	work practice involving specific operations
FACILITY	1-6	record keeping/maintenance procedures
FACILITY	1-7	monitoring of process or control device parameters as surrogate
FACILITY	35	record keeping/maintenance procedures
1-TANKS	183	record keeping/maintenance procedures
2-TANKS	184	record keeping/maintenance procedures

Basis for Monitoring

6NYCRR 228-1.3(a) NO PERSON SHALL CAUSE OR ALLOW EMISSIONS HAVING AN AVERAGE OPACITY DURING ANY SIX CONSECUTIVE MINUTES OF 20 PERCENT OR GREATER FROM ANY PROCESS EMISSION SOURCE, EXCEPT ONLY THE EMISSION OF UNCOMBINED WATER. COMPLIANCE WILL BE DETERMINED BY CONDUCTING A METHOD 9 OPACITY EVALUATION AT A MINIMUM FREQUENCY OF ONCE PER HALF YEAR, WHILE THE SOURCE IS IN NORMAL OPERATING MODE.

6 NYCRR 228-1.4(d)(2) THE FACILITY MUST MAINTAIN AND, UPON REQUEST, PROVIDE THE DEPARTMENT WITH A CERTIFICATION FROM THE COATING SUPPLIER/MANUFACTURER WHICH LISTS THE PARAMETERS USED TO DETERMINE THE ACTUAL VOC CONTENT OF EACH AS APPLIED COATING USED AT THE FACILITY (228-1.3(B)(1)).

6 NYCRR 228-1.4(d)(2) THE FACILITY APPLYING COATINGS TO FABRIC MAY NOT USE COATINGS WITH VOC CONTENTS, AS APPLIED, THAT EXCEED THE LIMITS SPECIFIED IN TABLE D-1. THE UNITS IN TABLE D-1 ARE IN TERMS OF WEIGHT OF VOC PER GALLON OF COATING (MINUS WATER AND EXEMPT VOC). THE LIMITS IN TABLE D-1 CAN BE MET BY AVERAGING THE VOC CONTENT OF THE MATERIALS USED ON A



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SINGLE SURFACE COATING LINE (I.E., DAILY WITH IN-LINE AVERAGING).

6 NYCRR 228-1.5(b) STACK TESTING OF JULY 2012 SHOWED COMPLIANCE WITH THE REQUIREMENTS OF 6 NYCRR 228-1.5(B). TO ENSURE CONTINUED COMPLIANCE WITH THE REQUIREMENTS, THE COMBUSTION CHAMBER TEMPERATURE OF THE OXIDIZER SHALL BE MAINTAINED ABOVE 900 C / 1652 F AND WILL BE MONITORED ON A CONTINUOUS BASIS USING AN ELECTRONIC RECORDER. RECORDER DATA MUST BE MAINTAINED AT THE FACILITY FOR A PERIOD OF FIVE YEARS.

40 CFR 63.4292(b), Subpart OOOO IF THE FACILITY USES A THERMAL OXIDIZER IN ORDER TO COMPLY WITH THE EMISSION RATE WITH ADD-ON CONTROLS OPTION, THE ORGANIC HAP OVERALL REMOVAL EFFICIENCY OPTION, OR THE OUTLET ORGANIC HAP CONCENTRATION OPTION, THEN THE FACILITY MUST NOT ALLOW THE AVERAGE TEMPERATURE IN ANY 3-HOUR BLOCK PERIOD TO FALL BELOW THE TEMPERATURE LIMIT ESTABLISHED DURING THE PERFORMANCE TEST ACCORDING TO §63.4363(A).

Condition 136 FABRIC COATING LINES, INCLUDING BUT LIMITED TO: RUBBER THAT IS USED FOR RAINWEAR, TENTS, AND INDUSTRIAL GASKETS, MAYNOT USE COATINGS WITH VOC CONTENTS, AS APPLIED, WHICH EXCEED 2.9 POUNDS OF VOC PER GALLON OF COATING (MINUS WATER AND EXCLUDED COMPOUNDS).

6 NYCRR 228-1.4(d)(3) THE FACILITY APPLYING COATINGS TO PAPER FILM AND FOIL MAY NOT USE COATINGS WITH VOC CONTENTS, AS APPLIED, WHICH EXCEED THE LIMITS SPECIFIED IN TABLE D-2. THE UNITS IN TABLE D-2 ARE IN TERMS OF WEIGHT OF VOC PER WEIGHT OF COATING APPLIED.
PRESSURE SENSITIVE TAPE AND LABEL SURFACE COATING 0.067 LB VOC / LB COATING
PAPER, FILM, AND FOIL 0.08 LB VOC / LB COATING

6 NYCRR 228-1.5(b) STACK TESTING OF JULY 2012 SHOWED COMPLIANCE WITH THE REQUIREMENTS OF 6 NYCRR 228-1.5(B). TO ENSURE CONTINUED COMPLIANCE WITH THE REQUIREMENTS, THE COMBUSTION CHAMBER TEMPERATURE OF THE OXIDIZER SHALL BE MAINTAINED ABOVE 877 C / 1610 F AND WILL BE MONITORED ON A CONTINUOUS BASIS USING AN ELECTRONIC RECORDER. RECORDER DATA MUST BE MAINTAINED AT THE FACILITY FOR A PERIOD OF FIVE YEARS. IN ADDITION, SEMIANNUAL REPORTS SHALL BE SUBMITTED TO THE DEPARTMENT REPORTING ALL PERIODS THAT THE TEMPERATURE OF THE OXIDIZER SYSTEM IS BELOW THE STATED VALUE.

40 CFR 60.744(e), NSPS Subpart VVV EACH OWNER OR OPERATOR OF AN AFFECTED FACILITY CONTROLLED BY A THERMAL INCINERATOR AND DEMONSTRATING COMPLIANCE BY THE TEST METHODS DESCRIBED IN 60.743 (A)(1), (2), (B), OR (C) (WHICH INCLUDE CONTROL DEVICE EFFICIENCY DETERMINATIONS) SHALL INSTALL, CALIBRATE, MAINTAIN, AND OPERATE, ACCORDING TO THE MANUFACTURER'S SPECIFICATIONS, A MONITORING DEVICE THAT CONTINUOUSLY INDICATES AND RECORDS THE COMBUSTION TEMPERATURE OF THE INCINERATOR. THE MONITORING DEVICE SHALL HAVE AN ACCURACY OF PLUS OR MINUS ONE PERCENT OF THE TEMPERATURE BEING MEASURED IN CELSIUS DEGREES.

40 CFR 63.8005(a), Subpart HHHHH AS REQUIRED IN §63.8005, FOR EACH STATIONARY PROCESS VESSEL AT AN EXISTING SOURCE, THE FACILITY MUST EQUIP THE VESSEL WITH A COVER OR LID THAT MUST BE IN PLACE AT ALL TIMES THEN THE VESSEL CONTAINS HAP, EXCEPT FOR MATERIAL ADDITIONS AND SAMPLING. IN ADDITION, THE FACILITY MUST REDUCE EMISSIONS OF ORGANIC HAP WITH A VAPOR EXISTING PRESSURE GREATER THAN OR EQUAL TO 0.6 KPA BY AT LEAST 75% BY WEIGHT. THE 75% REDUCTION REQUIREMENT CONSIDERS BOTH CAPTURE AND ANY COMBINATION OF CONTROL DEVICES (EXCEPT A FLARE).

40 CFR 63.8005(a), Subpart HHHHH AS REQUIRED IN §63.8005, FOR EACH STATIONARY PROCESS VESSEL AT AN EXISTING SOURCE, THE FACILITY MUST EQUIP THE VESSEL WITH A COVER OR LID THAT MUST BE IN PLACE AT ALL TIMES THEN THE VESSEL CONTAINS HAP, EXCEPT FOR MATERIAL ADDITIONS AND SAMPLING.
IN ADDITION, THE FACILITY MUST REDUCE EMISSIONS OF ORGANIC HAP WITH A VAPOR PARTIAL PRESSURE GREATER THAN 0.6 KPA BUT LESS THAN 17.2 KPA BY VENTING THE EMISSIONS THROUGH A



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**CLOSED-VENT SYSTEM TO A CONDENSER THAT REDUCES THE OUTLET GAS TEMPERATURE TO < 2 DEGREES C.
TO DEMONSTRATE INITIAL COMPLIANCE WITH THIS LIMIT, THE FACILITY MUST CONDUCT THE PERFORMANCE TEST OR DESIGN EVALUATION UNDER CONDITIONS AS SPECIFIED IN §63.7(E)(1), EXCEPT THAT THE PERFORMANCE TEST OR DESIGN EVALUATION MUST BE CONDUCTED UNDER WORST-CASE CONDITIONS.
THE PERFORMANCE TEST MUST BE CONDUCTED ACCORDING TO THE PROCEDURES LISTED IN §63.1257(B)(8) FOR BATCH PROCESSES, INCLUDING THE SUBMITTAL OF A SITE-SPECIFIC TEST PLAN FOR APPROVAL PRIOR TO TESTING.**