



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

Permit ID: 8-4674-00004/00104

Renewal Number: 2

05/01/2013

Facility Identification Data

Name: GUNLOCKE CO

Address: 1 GUNLOCKE DR

WAYLAND, NY 14572

Owner/Firm

Name: GUNLOCKE CO INC

Address: 1 GUNLOCKE DR

WAYLAND, NY 14572-9515, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: ROGER T MCDONOUGH

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Division of Air Resources:

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6274 E AVON-LIMA RD

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Air Permitting Contact:

Name: PETER HAGMIRE

Address: GUNLOCKE CO INC

1 GUNLOCKE DR

WAYLAND, NY 14572

Phone:5857288262

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

Application for renewal of Air Title V Facility. Removal of several small/closed emission points, corrected a source identified as electric drying oven to steam drying oven, and removed the capability to burn #2 distillate oil in the boiler, process 402, removed 5/1/2012; as well as sulfur in fuel condition (Part 225) and combustion conditions (Part 227) for process 402.

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Attainment Status

GUNLOCKE CO is located in the town of WAYLAND in the county of STEUBEN.
 The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (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 GUNLOCKE COMPANY MANUFACTURES WOOD CHAIRS AND CASE GOODS THROUGH A SERIES OF WOODWORKING, ADHESIVE APPLICATION, AND SURFACE COATING STEPS. TWO BOILERS OPERATE ON SITE.

Permit Structure and Description of Operations

The Title V permit for GUNLOCKE CO

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.

GUNLOCKE CO is defined by the following emission unit(s):



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Emission unit 100000 - Wood furniture cellular surface coating including line 3,4 U-Cell.

Emission unit 100000 is associated with the following emission points (EP):

1S001, 1S002, 1S003, 1S004, 1S005, 1S006, 1S007, 1S008, 1S009, 1S010, 1S011, 1S012, 1S013, 1S014, 1S015, 1S016, 1S017, 1S018, 1S019, 1S020, 1S021, 1S022, 1S023, 1S024, 1S025, 1S026, 1S027, 1S028, 1S029, 1S030, 1S031, 1S032, 1S033, 1S035, 1S036

Process: 100 is located at FLOOR 1, Building CASE - Stains, washcoats, fillers, sealers, and lacquers are applied in series to wood furniture components through the use of multiple, product dedicated, cellular coating systems. 6NYCRR Part 228 compliant coatings are received from the Gunlocke coating suppliers. Dry filters control particulate emissions from each spray booth. Steam heated ovens are used to cure the applied coatings.

Emission unit 200000 - Wood furniture adhesive operations.

Process: 200 is located at Building CASE - Rollcoaters apply adhesive to furniture cores prior to applying veneer. The rollcoaters are not vented through emission points.

Emission unit 300000 - Woodworking operations at Gunlocke consist of milling, machining, and sanding.

Emission unit 300000 is associated with the following emission points (EP):

00C23, 00C24, 00C25, 00C26, 00C31, 00D05, 00D32, 00D33, 3P204, 3P205, 3P206, 3P213

Process: 300 is located at FLOOR 1, Building CASE - Hardwood, mild hardwood, and particleboard are utilized in Gunlocke furniture manufacturing. The rough mill and stick mill initially process these materials into furniture components. The components are then machined and sanded at various points of the furniture assembly. All woodworking operations are connected to central vacuums which vent through one of fourteen dust collectors and two cyclones.

Emission unit 400000 - This unit consists of two boilers venting from the same stack. The E. Keeler boiler produces steam at 18 mmBtu/hr heat input, is controlled by a fly ash cyclone, and may be fired on wood, natural gas or a combination of wood/natural gas. Non-hazardous paint filters are also incinerated in this boiler. The Orr & Sembower boiler produces steam at 21 mmBtu/hr heat input and is fired on natural gas.

Emission unit 400000 is associated with the following emission points (EP):

00C01, 4B301

Process: 400 is located at FLOOR 1, Building CHAIR - Wood firing. Solid wood fuel from Gunlocke wood working operations is combusted. In addition, wood pallets from off-site may be used as a fuel.

Process: 401 is located at FLOOR 1, Building CHAIR - Natural gas firing.

Emission unit 600000 - A wood furniture surface coating line which utilizes a UV (Ultra violet) curable



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coating process. The coatings are applied by four direct roll coaters, and a robotic spray machine.

Emission unit 600000 is associated with the following emission points (EP):
00D41, 00D42, 00D43, 00D44, 00D45, 00D46, 00D47, 00D48, 00D49, 00D50, 00D51, 00D52, 00D53
Process: 101 is located at 1, Building CASE - Coating line used to apply UV curable coatings to wood furniture components. The line consists of four direct roll coaters, and the associated drying ovens.

Emission unit 600001 - A wood furniture surface coating line 6B which utilizes a U.V. curable coating process. The coatings are applied by a robotic spray machine.

Emission unit 600001 is associated with the following emission points (EP):
00D63, 00D65, 00D66, 00D67, 00D68, 00G69
Process: 06B is located at Building CASE - A wood furniture surface coating line 6B which utilizes a U.V. curable coating process. The coatings are applied by a robotic spray machine.

Title V/Major Source Status

GUNLOCKE CO is subject to Title V requirements. This determination is based on the following information:

Facility PTE VOC is > 50 YPY.

Facility PTE HAP is > 25 YPY.

Program Applicability

The following chart summarizes the applicability of GUNLOCKE CO with regards to the principal air pollution regulatory programs:

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards



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(NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - 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) - 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) - 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) - 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) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

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

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

SIP State Implementation Plan (40 CFR 52, Subpart HH) - 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



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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

2521	WOOD OFFICE FURNITURE
9999	NONCLASSIFIABLE ESTABLISHMENTS

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

1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-009-06	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - WOOD/BARK WASTE Wood-Fired Boiler (< 50,000 LB Steam)
3-07-020-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - FURNITURE MANUFACTURE Other Not Classified
4-02-019-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - WOOD FURNITURE SURFACE COATING Coating Operation

Facility Emissions Summary

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



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CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 50 tpy but < 100 tpy
0NY100-00-0	HAP		>= 250 tpy but < 75,000 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 50 tpy but < 100 tpy
0NY075-00-0	PARTICULATES		>= 50 tpy but < 100 tpy
0NY075-00-5	PM-10		>= 50 tpy but < 100 tpy
007446-09-5	SULFUR DIOXIDE		>= 25 tpy but < 40 tpy
0NY998-00-0	VOC		>= 250 tpy but < 75,000 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
 - (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
 - (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.



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- Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)**
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.
- Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.



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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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

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

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



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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 L: Permit Exclusion - ECL 19-0305

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

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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
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FACILITY	ECL 19-0301	93		Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63-A.10	31, 32		Recordkeeping and Reporting
6-00001	40CFR 63-A.6(b)(2)	86		Compliance dates for new and reconstructed sources
1-00000	40CFR 63-JJ.802(a)(1)	45, 46, 47, 48		
6-00000	40CFR 63-JJ.802(a)(1)	72, 73, 74, 75		
6-00001	40CFR 63-JJ.802(a)(1)	87, 88, 89, 90		
2-00000	40CFR 63-	53		
	JJ.802(a)(2)(i)			
2-00000	40CFR 63-	54		
	JJ.802(a)(2)(i)			
1-00000	40CFR 63-JJ.802(a)(3)	49		
6-00000	40CFR 63-JJ.802(a)(3)	76		
6-00001	40CFR 63-JJ.802(a)(3)	91		
FACILITY	40CFR 63-JJ.803	33		Subpart JJ: Work practice standards
2-00000	40CFR 63-JJ.804(g)(5)	55		Semi-annual reporting requirements for compliant contact adhesives
1-00000	40CFR 63-JJ.804(g)(8)	50		Compliance certification for work practice standards
2-00000	40CFR 63-JJ.804(g)(8)	56		Compliance certification for work practice standards
6-00000	40CFR 63-JJ.804(g)(8)	77		Compliance certification for work practice standards
6-00001	40CFR 63-JJ.804(g)(8)	92		Compliance certification for work practice standards
FACILITY	40CFR 63-JJ.806	34		Subpart JJ: Recordkeeping requirements
FACILITY	40CFR 68	11		Chemical accident prevention provisions
FACILITY	40CFR 82-F	12		Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1		Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	5		Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	94		Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	6		Recycling and Salvage
FACILITY	6NYCRR 201-1.8	7		Prohibition of reintroduction of collected contaminants to the

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FACILITY	6NYCRR 201-3.2(a)	8	air
FACILITY	6NYCRR 201-3.3(a)	9	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	13, 35, 36	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.4(a)(4)	14	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(7)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(c)	17	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)(2)	18	Recordkeeping and Reporting of Compliance Monitoring Records of Monitoring, Sampling and Measurement Reporting
FACILITY	6NYCRR 201- 6.4(c)(3)(ii)	19	Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	20	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	21	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	22	Off Permit Changes
FACILITY	6NYCRR 202-1.1	10	Required emissions tests.
FACILITY	6NYCRR 202-2.1	2	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	3	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	23	General Prohibitions - air pollution prohibited
2-00000	6NYCRR 212.4(a)	51	General Process Emission Sources - emissions from new sources and/or modifications
3-00000	6NYCRR 212.4(a)	57	General Process Emission Sources - emissions from new sources and/or modifications
3-00000	6NYCRR 212.4(c)	58	General Process Emission Sources - emissions from new processes and/or modifications
3-00000/-/300	6NYCRR 212.6(a)	59	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	4	Open Fires - Prohibitions
4-00000/-/400	6NYCRR 227-1.2(a)(4)	60, 61	Particulate Emissions Firing Solid Fuels.
4-00000/-/400	6NYCRR 227-1.3(a)	62	Smoke Emission



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4-00000/-/401	6NYCRR 227-1.3 (a)	63	Limitations. Smoke Emission Limitations.
FACILITY	6NYCRR 228-1.1 (d)	24	Will remain subject
1-00000	6NYCRR 228-1.3 (a)	37	Recordkeeping, reports for VOCs
2-00000	6NYCRR 228-1.3 (a)	52	Recordkeeping, reports for VOCs
6-00000	6NYCRR 228-1.3 (a)	64	Recordkeeping, reports for VOCs
6-00001	6NYCRR 228-1.3 (a)	78	Recordkeeping, reports for VOCs
1-00000	6NYCRR 228-1.4	38	Opacity
6-00000	6NYCRR 228-1.4	65	Opacity
6-00001	6NYCRR 228-1.4	79	Opacity
FACILITY	6NYCRR 228-1.5 (a)	25	VOC recordkeeping by the facility
FACILITY	6NYCRR 228-1.5 (b)	26	Use of Methods 311 or 24.
FACILITY	6NYCRR 228-1.5 (d)	27	Department Access to Obtain Samples
FACILITY	6NYCRR 228-1.5 (j)	28	Record of noncompliance
FACILITY	6NYCRR 228-1.5 (k)	29	Records maintained for five years
FACILITY	6NYCRR 228-1.6 (a)	30	Prohibition of Sale
1-00000	6NYCRR 228-1.8	39, 40, 41, 42, 43, 44	Table 2
6-00000	6NYCRR 228-1.8	66, 67, 68, 69, 70, 71	Table 2
6-00001	6NYCRR 228-1.8	80, 81, 82, 83, 84, 85	Table 2

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



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6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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



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sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

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

40 CFR 63.10

Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

40 CFR 63.6 (b) (2)

This condition requires new sources constructed or reconstructed after the effective date of a MACT standard to comply upon startup.

40 CFR 63.802 (a) (1)

This provision specifies the emission limits for finishing operations at existing facilities that are subject to the Wood Furniture Manufacturing Operations NESHAP. The provision refers the facility to a table which includes specific limits on the volatile hazardous air pollutant (VHAP) content in the coating used.

40 CFR 63.802 (a) (2) (i)

40 CFR 63.802 (a) (2) (ii)

40 CFR 63.802 (a) (3)

This provision establishes an emission limit on HAP's from strippable spray booths by limiting the percentage of VOC's in the coatings.

40 CFR 63.803

The work practice implementation plan **is required for all facilities** subject to Subpart JJ. The required



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content is found in section 40CFR 63.803 (b) through (l). Two optional conditions have been created in AFS for this part. One simply states that the work practice plan is required. The other includes all of the required content of the plan.

40 CFR 63.804 (g) (5)

In order to prove that the facility has continuously been in compliance with the volatile hazardous air pollutant content standards for adhesives in the Wood Furniture Manufacturing Operations NESHAP rule, the facility must submit a statement that compliant adhesives have been used each day.

40 CFR 63.804 (g) (8)

In order to prove that the facility has continuously been in compliance with the work practice standards in the Wood Furniture Manufacturing Operations NESHAP rule, the facility must submit a statement that the "work practice implementation plan" is being followed and if it isn't, the reasons why it hasn't been followed.

40 CFR 63.806

This section lists all of the records that the facility must keep in order to prove that it is remaining in compliance with the Wood Furniture Manufacturing Operations NESHAP rule.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide any 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.



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6 NYCRR 201-6.4 (c) (2)

This requirement applies to all facilities subject to Title V requirements and 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) (4)

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 (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 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 212.4 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6 NYCRR 212.4 (c)



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This rule requires existing sources (in operation after 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 0.05 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 227-1.2 (a) (4)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units which fire solid fuels at variable sizes of heat input (mmBtu/hr).

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 228-1.1 (d)

This citation states that any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228, will remain subject even if the annual potential to emit volatile organic compounds for the facility later falls below the thresholds set forth in this regulation. This is known as the "Once In Always In" provision.

6 NYCRR 228-1.3 (a)

This citation prohibits the use of coatings that exceed the maximum permitted pounds of volatile organic compounds per gallon, unless a coating system meeting certain requirements is used.

6 NYCRR 228-1.4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission source subject to this Part.

6 NYCRR 228-1.5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacture which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228, to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.



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6 NYCRR 228-1.5 (b)

This citation requires the owner and operator of any emission source subject to Part 228 to, upon request by the Department, use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, to measure the volatile content, water content, density, volume of solids and weight of solids in order to determine the actual VOC content of an applied coating during a compliance demonstration.

6 NYCRR 228-1.5 (d)

This citation allows representatives of the Department to obtain coating samples during reasonable business hours, for the purpose of determining compliance.

6 NYCRR 228-1.5 (j)

This citation requires any information or record showing noncompliance with the requirements of Part 228 to be reported to Department within 30 days of generation of the information or record..

6 NYCRR 228-1.5 (k)

This requires all records required by this regulation to be maintained at the facility for a period of five years

6 NYCRR 228-1.6 (a)

This citation exempts specific coatings (or under specific conditions) from the prohibition of sale or specification.

6 NYCRR 228-1.8

Table 2 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

Compliance Certification

Summary of monitoring activities at GUNLOCKE CO:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
1-00000	45	monitoring of process or control device parameters as surrogate
1-00000	46	monitoring of process or control device parameters as surrogate
1-00000	47	monitoring of process or control device parameters

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1-00000	48	as surrogate monitoring of process or control device parameters as surrogate
6-00000	72	monitoring of process or control device parameters as surrogate
6-00000	73	monitoring of process or control device parameters as surrogate
6-00000	74	monitoring of process or control device parameters as surrogate
6-00000	75	monitoring of process or control device parameters as surrogate
6-00001	87	monitoring of process or control device parameters as surrogate
6-00001	88	monitoring of process or control device parameters as surrogate
6-00001	89	monitoring of process or control device parameters as surrogate
6-00001	90	monitoring of process or control device parameters as surrogate
2-00000	53	monitoring of process or control device parameters as surrogate
2-00000	54	monitoring of process or control device parameters as surrogate
1-00000	49	monitoring of process or control device parameters as surrogate
6-00000	76	monitoring of process or control device parameters as surrogate
6-00001	91	monitoring of process or control device parameters as surrogate
FACILITY	33	record keeping/maintenance procedures
2-00000	55	record keeping/maintenance procedures
1-00000	50	record keeping/maintenance procedures
2-00000	56	record keeping/maintenance procedures
6-00000	77	record keeping/maintenance procedures
6-00001	92	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	19	record keeping/maintenance procedures
FACILITY	21	record keeping/maintenance procedures
FACILITY	2	record keeping/maintenance procedures
2-00000	51	record keeping/maintenance procedures
3-00000	57	record keeping/maintenance procedures
3-00000	58	monitoring of process or control device parameters as surrogate
3-00000/-/300	59	record keeping/maintenance procedures
4-00000/-/400	60	intermittent emission testing
4-00000/-/400	61	record keeping/maintenance procedures
4-00000/-/400	62	monitoring of process or control device parameters as surrogate
4-00000/-/401	63	monitoring of process or control device parameters as surrogate
1-00000	38	record keeping/maintenance procedures
6-00000	65	record keeping/maintenance procedures
6-00001	79	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	28	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
1-00000	39	work practice involving specific operations
1-00000	40	work practice involving specific operations
1-00000	41	work practice involving specific operations
1-00000	42	work practice involving specific operations
1-00000	43	work practice involving specific operations
1-00000	44	work practice involving specific operations
6-00000	66	work practice involving specific operations
6-00000	67	work practice involving specific operations



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6-00000	68	work practice involving specific operations
6-00000	69	work practice involving specific operations
6-00000	70	work practice involving specific operations
6-00000	71	work practice involving specific operations
6-00001	80	work practice involving specific operations
6-00001	81	work practice involving specific operations
6-00001	82	work practice involving specific operations
6-00001	83	work practice involving specific operations
6-00001	84	work practice involving specific operations
6-00001	85	work practice involving specific operations

Basis for Monitoring

Facility specific monitoring conditions were used to improve upon AFS library conditions. Monitoring frequencies were variable dependent upon the chance of non-compliance per source. Gunlocke is required to perform a Method 5 test and daily Method 9 tests for process 400, burning wood. Also, burning filters and pallets requires additional monitoring activities. Part 201,202,212, 225-1, and 228 conditions are standard. 2 caps (<40tpy VOC) are to avoid NSR applicability for the UV coating sources.