

**Division of Air Resources
Permit Review Report**

Permit ID: 9-1456-00142/00017

Renewal Number: 3

03/21/2022

Facility Identification Data

Name: WHITING DOOR MANUFACTURING CORP

Address: 113 CEDAR ST

AKRON, NY 14001

Owner/Firm

Name: WHITING DOOR MFG CORP

Address: 113 CEDAR ST

AKRON, NY 14001-1038, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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Air Permitting Contact:

Name: MICHAEL T WHITING

Address: WHITING DOOR MANUFACTURING CORP

113 CEDAR ST

AKRON, NY 14001

Phone:7165425427

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.

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This application contains updated emissions information and addresses minor modifications that have occurred since the date of the last renewal. These modifications include the addition of a cyclone unit for managing dust and shavings generated from the trimming/shearing of polyethylene composite panels and changes to app has been addressed under separate new emission unit referred to as U-00028.

Attainment Status

WHITING DOOR MANUFACTURING CORP is located in the town of NEWSTEAD in the county of ERIE.

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* | 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:

Whiting Door Manufacturing Corporation is located at 113 Cedar Street in the Village of Akron. The facility manufactures and paints roll-up doors for trucks and trailer bodies. The facility is required to have a Title V Permit due to the fact that the actual VOC emissions are greater than 50 tons per year. The facility consists of five emission units:

U-00023 - one E-Coat surface coating system consisting of one dip tank, one drying oven and a fluid clean system. Paint is electrostatically deposited on metal parts in the dip tank.

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U-00025 - two primer application booths (Paint Room and Saw Room) where primers are spray applied to wooden doors with metal hardware and dried in an infrared, catalytic heated air flow drying unit. Each primer application booth is equipped with a fabric filter for particulate control.

U-00026 - a painting application system comprised of a primer application booth, a primer drying oven, and an enamel application booth. Primers are spray applied to wooden doors with metal hardware and dried in an infrared, catalytic heated air flow drying unit. Enamels and top coats are spray applied to wooden doors with metal hardware. The enamels are air-dried. Each application booth is equipped with a fabric filter for particulate control.

U-00027 - one enamel paint application booth where top coats are spray applied to wooden doors with metal hardware. The enamels are air-dried. The paint application booth is equipped with a fabric filter for particulate control.

U-00028 - a cyclone system used for managing dust and shavings from the trimming/shearing of polyethylene composite panels. Exhaust air from the cyclone is conveyed to a baghouse for particulate removal prior to being discharged to the atmosphere.

This renewal permit incorporates the requirements of the Air State Facility (ASF) Permit issued to Whiting Door Manufacturing Corporation on April 15, 1999. The ASF Permit allowed for the construction and operation of emission unit U-00026 and limited VOC emissions from that new emission unit to less than 39 tons during any consecutive 12 month period. The 39 ton VOC limit caps emissions from emission unit U-00026 below the applicability threshold of 6 NYCRR Part 231-2 New Source Review in Nonattainment Areas. The VOC emission cap continues in force under this Title V permit.

The facility is subject to the VOC coating content requirements of 6 NYCRR Part 228. Emission unit U-00023 is subject to the compliant coating requirements for miscellaneous metal parts - extreme performance coatings - in 6 NYCRR Part 228-1.4(b) (Table B4). Emissions units U-00025, U-00026 and U-20007 are subject to the compliant coating requirements for wood coating lines topcoats and sealers - in 6 NYCRR Part 228-1.4(c) (Table C2).

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The facility is also subject to the opacity limit of 6 NYCRR Part 212-2.4(b).

The facility also operates several sources which are considered to be either trivial or exempt according to 6 NYCRR Part 201-3 including combustion, woodworking (with appropriate air pollution control devices), metalworking, welding and foam processes and an emergency diesel-powered generator. The generator is subject to 40 CFR 63 Subpart ZZZZ.

Permit Structure and Description of Operations

The Title V permit for WHITING DOOR MANUFACTURING CORP

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.

WHITING DOOR MANUFACTURING CORP is defined by the following emission unit(s):

Emission unit U00023 - This emission unit consists of an e-coat surface coating operation consisting of a dip tank, a drying oven and a fluid clean system. The emission points are located in buildings I and J of the Cedar Street Facility.

Emission unit U00023 is associated with the following emission points (EP):
00012, 00017

Process: 231 is located at BUILDING J, Building CEDAR - This process consists of a coating system where parts are passed by conveyor through a dip tank where paint is electrostatically deposited on the parts. The conveyor then transfers the parts to a curing oven where the paint is dried.

Process: 234 is located at BUILDING I, Building CEDAR - Fluid Clean System.

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Emission unit U00025 - This emission unit consists of two primer application booths, specifically the paint room primer booth (EP-01) and the saw room primer booth (EP-07), and one primer dryer (EP-08).

Emission unit U00025 is associated with the following emission points (EP):

00001, 00007, 0008A, 0008B

Process: 251 is located at BUILDING F, Building CEDAR - This process is a primer application system consisting of a coating booth where primers are spray applied to wooden doors with metal hardware and dried in an infrared, catalytic heated air flow drying unit.

Process: 252 is located at BUILDING E, Building CEDAR - This process is a primer application system consisting of a coating booth where primers are spray applied to wooden doors with metal hardware.

Emission unit U00026 - This emission unit consists of a painting system comprised of a primer application booth (EP-13), a primer drying oven (EP-14), and an enamel application booth (EP-15).

Emission unit U00026 is associated with the following emission points (EP):

00013, 00014, 00015

Process: 261 is located at BUILDING O, Building CEDAR - This process is a primer application system consisting of a coating booth where primers are applied to wooden doors with metal hardware and dried in an infrared, catalytic heated air flow drying unit.

Process: 262 is located at BUILDING O, Building CEDAR - This process is an enamel application system consisting of a coating booth where enamels/top coats are applied to wooden doors with metal hardware.

Emission unit U00027 - This emission unit consists of one enamel application booth, specifically the paint room enamel booth (EP-02).

Emission unit U00027 is associated with the following emission points (EP):

00002

Process: 271 is located at BUILDING F, Building CEDAR - This unit consists of a coating booth at which enamel top-coats are spray applied to wooden doors with metal hardware.

Emission unit U00028 - This emission unit consists of a cyclone system used to manage dust and shavings from the trimming/shearing of polyethylene composite panels.

Emission unit U00028 is associated with the following emission points (EP):

00018

Process: 281 is located at Building CEDAR - This process consists of a cyclone system that is used for managing dust and shavings from the trimming/shearing of polyethylene composite panels.

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Title V/Major Source Status

WHITING DOOR MANUFACTURING CORP is subject to Title V requirements. This determination is based on the following information:
 Due to the fact that Whiting Door Manufacturing Corp's actual VOC emissions are greater than 50 tons per year, it is considered a major source.

Program Applicability

The following chart summarizes the applicability of WHITING DOOR MANUFACTURING CORP 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, 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.

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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, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

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

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

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

| | |
|------|-----------------------------------|
| 3442 | METAL DOORS, SASH, AND TRIM |
| 3714 | MOTOR VEHICLE PARTS & ACCESSORIES |

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

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emissions. Any operation that causes air pollution can be represented by one or more SCC's.

| SCC Code | Description |
|-------------|--|
| 3-07-008-05 | PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SAWMILL OPERATIONS Planning/Trimming: Cyclone Exhaust |
| 4-02-005-01 | SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Enamel |
| 4-02-005-10 | SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Enamel |
| 4-02-006-01 | SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Primer |
| 4-02-014-01 | SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - LARGE APPLIANCES Prime Coating Operation |
| 4-02-014-32 | SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - LARGE APPLIANCES Prime Air Spray |
| 4-02-014-38 | SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - LARGE APPLIANCES Top Electrostatic Spray |
| 4-02-025-02 | SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Cleaning/Pretreatment |

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 |
|-------------|--------------------------|------------|-------------|---------------|----------------|
| 000106-99-0 | 1,3-BUTADIENE | 0.4 | | 0.001 | |
| 000108-10-1 | 2-PENTANONE, 4-METHYL | 8685 | | 3762 | |
| 000075-07-0 | ACETALDEHYDE | 6 | | 0.02 | |

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| | | | |
|-------------|---|----------|---------|
| 000107-02-8 | ACROLEIN | 0.8 | 0.002 |
| 0NY750-00-0 | CARBON DIOXIDE EQUIVALENTS | 38119104 | 4842268 |
| 000630-08-0 | CARBON MONOXIDE | 67430 | 8043 |
| 000112-34-5 | ETHANOL, 2- (2- BUTOXYETHOXY) - | 242 | 108 |
| 000112-07-2 | ETHANOL, 2- BUTOXY-, ACETATE | 97 | 40 |
| 000100-41-4 | ETHYLBENZENE | 2532 | 707 |
| 000050-00-0 | FORMALDEHYDE | 9 | 0.04 |
| 000822-06-0 | HEXANE, 1,6- DIISOCYANATO- | 995 | 382 |
| 000091-20-3 | NAPHTHALENE | 0.6 | 0.003 |
| 008007-18-9 | NICKEL ANTIMONY TITANIUM YELLOW RUTILE | 23 | 0.1 |
| 0NY210-00-0 | OXIDES OF NITROGEN | 180595 | 7792 |
| 0NY075-00-0 | PARTICULATES | 392307 | 5899 |
| 000115-07-1 | PROPYLENE | 22 | 0.08 |
| 014808-60-7 | QUARTZ | 40 | 0.4 |
| 012624-32-7 | SULFUR OXIDE | 9609 | 61 |
| 000108-88-3 | TOLUENE | 3402 | 1312 |
| 0NY100-00-0 | TOTAL HAP | 28821 | 9891 |
| 0NY998-00-0 | VOC | 284035 | 112873 |
| 001330-20-7 | XYLENE, M, O & P MIXT. | 14777 | 4127 |

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

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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 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

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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.

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.

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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.

(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.

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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 | 36 | Powers and Duties of the Department with respect to air pollution control |
| FACILITY | 40CFR 63-ZZZZ | 30 | Reciprocating Internal Combustion Engine (RICE) NESHAP |
| FACILITY | 40CFR 68 | 18 | Chemical accident prevention provisions |
| FACILITY | 40CFR 82-F | 19 | 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 201-1.4 | 37 | 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 | 20, 31, 32 | 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 | 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 - |

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| | | | |
|----------|------------------------|--------|---|
| FACILITY | 6NYCRR 201-6.4 (d) (4) | 21 | Deviations and Noncompliance Compliance Schedules - Progress Reports Certification Operational Flexibility State Enforceable Requirements Emission Capping in Facility Permits Required emissions tests. Emission Statements - Applicability Emission Statements - record keeping requirements. General Prohibitions - air pollution prohibited General Prohibitions - visible emissions limited. Limiting of Opacity Control of Particulate from New and Modified Process Emission Sources Open Fires - Prohibitions Prohibitions. Exceptions. General Requirements for Surface Coating Processes Surface Coating General Requirements- Opacity Class B coating lines Class C Coating Line, Wood Finishing |
| FACILITY | 6NYCRR 201-6.4 (e) | 6 | |
| FACILITY | 6NYCRR 201-6.4 (f) | 22 | |
| FACILITY | 6NYCRR 201-6.5 (a) | 38 | |
| FACILITY | 6NYCRR 201-7.1 | 23, 33 | |
| FACILITY | 6NYCRR 202-1.1 | 17 | |
| FACILITY | 6NYCRR 202-2.1 | 7 | |
| FACILITY | 6NYCRR 202-2.5 | 8 | |
| FACILITY | 6NYCRR 211.1 | 39 | |
| FACILITY | 6NYCRR 211.2 | 24 | |
| FACILITY | 6NYCRR 212-1.6 (a) | 25 | |
| FACILITY | 6NYCRR 212-2.4 (b) | 26 | |
| FACILITY | 6NYCRR 215.2 | 9 | |
| FACILITY | 6NYCRR 217-3.2 | 40 | |
| FACILITY | 6NYCRR 217-3.3 | 41 | |
| FACILITY | 6NYCRR 228-1.3 | 27 | |
| FACILITY | 6NYCRR 228-1.3 (a) | 28 | |
| U-00023 | 6NYCRR 228-1.4 (b) | 34 | |
| FACILITY | 6NYCRR 228-1.4 (c) | 29 | |

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

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6 NYCRR 201-1.4

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

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

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

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inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

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

6 NYCRR 201-6.4 (c) (2)

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

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, WHITING DOOR MANUFACTURING CORP has been determined to be subject to the following regulations:

40 CFR Part 63, Subpart ZZZZ

Subpart ZZZZ applies to reciprocating internal combustion engines. Sources subject to Subpart ZZZZ must limit emissions of carbon monoxide and formaldehyde. Sources must also comply with work practice standards and operating limits.

6 NYCRR 201-6.4 (f)

This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 201-6.5 (a)

This subdivision states that the Department shall include state enforceable conditions in Title V permits. State enforceable conditions related to regulations developed pursuant to the Climate Leadership and Community Protection Act (CLCPA) and Article 75 of New York State Environmental Conservation Law may be included in future versions of this permit, as applicable.

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.

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6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212-1.6 (a)

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

6 NYCRR 212-2.4 (b)

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

6 NYCRR 217-3.2

No person who owns, operates or leases a heavy duty vehicle including a bus or truck, the motive power for which is provided by a diesel or nondiesel fueled engine or who owns, leases or occupies land and has the actual or apparent dominion or control over the operation of a heavy duty vehicle including a bus or truck present on such land, the motive power for which said heavy duty vehicle is provided by a diesel or non-diesel fueled engine, shall allow or permit the engine of such heavy duty vehicle to idle for more than five consecutive minutes when the heavy duty vehicle is not in motion, except as otherwise permitted by section 217-3.3 of this Subpart.

6 NYCRR 217-3.3

The prohibitions of section 217-3.2 of this Subpart shall not apply when:

- (a) A diesel or nondiesel fueled heavy duty vehicle including a bus or truck is forced to remain motionless because of the traffic conditions over which the operator thereof has no control.
- (b) Regulations adopted by Federal, State or local agencies having jurisdiction require the maintenance of a specific temperature for passenger comfort. The idling time specified in section 217-3.2 of this Subpart may be increased, but only to the extent necessary to comply with such regulations.
- (c) A diesel or nondiesel fueled engine is being used to provide power for an auxiliary purpose, such as loading, discharging, mixing or processing cargo; controlling cargo temperature; construction; lumbering; oil or gas well servicing; farming; or when operation of the engine is required for the purpose of maintenance.
- (d) Fire, police and public utility trucks or other vehicles are performing emergency services.
- (e) Trucks owned or operated by persons engaged in mining and quarrying are used within the confines of such person's property.
- (f) A diesel fueled truck is to remain motionless for a period exceeding two hours, and during which period the ambient temperature is continuously below 25°F.

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(g) A heavy duty diesel vehicle, as defined in section 217-5.1(o) of this Part, that is queued for or is undergoing a State authorized periodic or roadside diesel emissions inspection pursuant to Subpart 217-5 of this Part.

(h) A hybrid electric vehicle, as defined in section 217-5.1(r) of this Part, idling for the purpose of providing energy for battery or other form of energy storage recharging.

(i) Heavy duty vehicles used for agricultural purposes on a farm.

(j) Electric powered vehicles.

6 NYCRR 228-1.3

Any facility operating a coating line subject to this Subpart must comply with general requirements

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 228-1.4 (b)

Miscellaneous metal parts and product coating lines utilizing extreme performance coatings may contain a maximum of 3.0 pounds of volatile organic compounds (VOCs) per gallon of coating (minus water and excluded VOC) as applied if cured/baked in oven or 3.5 pounds VOC per gallon if air dried. Certifications shall be obtained from coating suppliers/manufacturers showing VOC content of coatings. These records will be kept on-site to demonstrate compliance with VOC content limits.

6 NYCRR 228-1.4 (c)

Wood finishing coatings must be applied using a high volume low pressure (HVLP) spray gun except in the following instances:

- the coating being applied emits less than 1.0 kg(lb) VOC per kg (lb) of solids used;
- for the touch-up and repair;
- when the spray is automated;
- when add-on controls are employed; or
- if the cumulative application is less than 5.0 percent of the total gallons of coating applied.

Wood finishing coatings applied by facility must meet the following VOC content limits (as applied):

Sealers - 1.9 lb VOC/lb solids

Topcoats - 1.8 lb VOC/lb solids

Acid-cured alkyd amino vinyl sealers - 2.3 lb VOC/lb solids

Acid-cured alkyd amino conversion varnish sealers - 2.0 lb VOC/lb solids

Certifications shall be obtained from coating suppliers/manufacturers showing VOC content of coatings. These records will be kept on-site to demonstrate compliance with applicable VOC content limits.

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Compliance Certification

Summary of monitoring activities at WHITING DOOR MANUFACTURING CORP:

| Location Facility/EU/EP/Process/ES | Cond No. | Type of Monitoring |
|---|-----------------|--|
| ----- | | |
| --- | | |
| FACILITY | 30 | record keeping/maintenance procedures |
| FACILITY | 5 | record keeping/maintenance procedures |
| FACILITY | 6 | record keeping/maintenance procedures |
| U-00026 | 35 | work practice involving specific operations |
| FACILITY | 7 | record keeping/maintenance procedures |
| FACILITY | 25 | monitoring of process or control device parameters as surrogate |
| FACILITY | 26 | intermittent emission testing |
| FACILITY | 27 | record keeping/maintenance procedures |
| FACILITY | 28 | monitoring of process or control device parameters as surrogate |
| U-00023 | 34 | record keeping/maintenance procedures |
| FACILITY | 29 | record keeping/maintenance procedures |
| ----- | | |
| ---- | | |

Basis for Monitoring

All monitoring requirements were developed to provide a means for evaluating the proper control of emissions at Whiting Door Manufacturing Corp. In particular, VOC emissions are controlled by pounds of VOC per gallon of paint used.