

Facility DEC ID: 3130200017

**PERMIT
Under the Environmental Conservation Law (ECL)**

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-1302-00017/00019
Effective Date: 11/16/2022 Expiration Date: 11/15/2032

Permit Issued To:CHEMPRENE LLC
483 FISHKILL AVE
BEACON, NY 12508

Facility: CHEMPRENE INC
483 FISHKILL AVE
BEACON, NY 12508-1200

Description:
The facility manufactures lightweight conveyor belts and rubber (polymer) coated fabrics. Raw rubber is compounded and mixed to form coatings used on purchased substrates, a majority of which are textile. The facility is comprised of raw product mixing mills, five spreader/oven coating lines and two 20.92 MMBTU/hr boilers capable of firing natural gas or No. 2 fuel oil as backup. There are several additional activities at the facility including toluene storage, solvent and rubber mixing in vessels and steam/ electric fired curing/vulcanizing ovens (one 0.7475 MMBTU/Hr vulcanizing oven of which is capable of firing natural gas or No. 2 fuel as a backup). A catalytic oxidizer is used for the control of VOCs from the solvent-related coating lines.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: REBECCA S CRIST
21 S PUTT CORNERS RD
NEW PALTZ, NY 12561

Authorized Signature: _____ Date: ___ / ___ / ____

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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

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- 4 2 Relationship of this Permit to Other Department Orders and Determinations
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Facility Level

- 5 5 Submission of application for permit modification or renewal
-REGION 3 HEADQUARTERS

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

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal -REGION 3 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 3 Headquarters
Division of Environmental Permits
21 South Putt Corners Road
New Paltz, NY 12561-1696
(845) 256-3054

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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To:CHEMPRENE LLC
483 FISHKILL AVE
BEACON, NY 12508

Facility: CHEMPRENE INC
483 FISHKILL AVE
BEACON, NY 12508-1200

Authorized Activity By Standard Industrial Classification Code:
3052 - RUBBER AND PLASTICS HOSE AND BELTING
3069 - FABRICATED RUBBER PRODUCTS, NEC

Permit Effective Date: 11/16/2022

Permit Expiration Date: 11/15/2032

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FEDERALLY ENFORCEABLE CONDITIONS

FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

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required to operate such device effectively.

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

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

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

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

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial

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Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

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

Condition 2: Open Fires - Prohibitions
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 215.2

Item 2.1:

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

Item 2.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous

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agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.

(e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.

(f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.

(g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.

(h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.

(i) Prescribed burns performed according to Part 194 of this Title.

(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

Condition 3: Recycling and Salvage
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 3.1:

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 4: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 4.1:

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

Condition 5: Exempt Sources - Proof of Eligibility
Effective between the dates of 11/16/2022 and 11/15/2032

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Applicable Federal Requirement:6 NYCRR 201-3.2 (a)**Item 5.1:**

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 6: Trivial Sources - Proof of Eligibility
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)**Item 6.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 7: Required Emissions Tests
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 202-1.1**Item 7.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 8: Accidental release provisions.
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:40 CFR Part 68**Item 8.1:**

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

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2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
 C/O CSC
 8400 Corporate Dr
 Carrollton, Md. 20785

Condition 9: Recycling and Emissions Reduction
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:40CFR 82, Subpart F

Item 9.1:
 The permittee shall comply with all applicable provisions of 40 CFR Part 82.

Condition 10: Facility Permissible Emissions
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 10.1:
 The sum of emissions from the emission units specified in this permit shall not equal or exceed the following
 Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 000078-93-3 Name: METHYL ETHYL KETONE	PTE: 19,500 pounds per year
CAS No: 000108-88-3 Name: TOLUENE	PTE: 19,500 pounds per year
CAS No: 0NY075-00-0 Name: PARTICULATES	PTE: 190,000 pounds per year
CAS No: 0NY100-00-0 Name: TOTAL HAP	PTE: 48,000 pounds per year
CAS No: 0NY998-00-0 Name: VOC	PTE: 80,000 pounds per year

Condition 11: Capping Monitoring Condition
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 11.1:
 Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would

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otherwise be subject to:

6 NYCRR Subpart 201-6
 40 CFR Part 63, Subpart U
 40 CFR Part 63, Subpart OOOO

Item 11.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 11.3:

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.

Item 11.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 11.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 11.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000078-93-3	METHYL ETHYL KETONE
CAS No: 000108-88-3	TOLUENE

Item 11.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Chemprene is proposing to limit individual Hazardous Air Pollutions (HAPs) emissions below major source threshold of 10 tons per year (tpy). Computer spreadsheets will be maintained to track HAPs containing purchases and amounts used monthly such that no individual HAP (Toluene and MEK) exceeds 9.75 tpy. Records will be kept on a current 12-month rolling total and reported annually.

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Individual HAPs emissions are based on the following:

Boilers (Emission Unit: B-07A08) and Catalytic Oxidizer (Emission Unit: C-SPRDS, Emission Source: CATOX) fuel usage using AP-42 Chapter 1: External Combustion Sources, emission factors.

Churn and Spreading MEK and Toluene (C-00113 and C-SPRDS) solvent processed. For the Churn Room emissions (C-00113) assume Toluene and MEK evaporation rates of 3% and 4%, respectively. Remaining solvents (Spreader emissions) are ducted to the Catalytic Oxidizer which has a 90% control efficiency based on stack testing. Bypass emissions without control (C-SPRDS Process BYP) are allowed up to 100 hours per year.

C-INSIG milling and mixing processes (BOL and MIL) material throughput data using AP-42. Section 4.12: Manufacture of Rubber Products emission factors.

C-INSIG vulcanizing process (VUL) material throughput data using AP-42. Section 4.12: Manufacture of Rubber Products emission factors.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: SOLVENT
Parameter Monitored: SOLVENT
Upper Permit Limit: 9.75 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2023.
Subsequent reports are due every 12 calendar month(s).

Condition 12: Capping Monitoring Condition
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 12.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

Item 12.2:

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Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 12.3:

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.

Item 12.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 12.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 12.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 12.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Chemprene is proposing to limit volatile organic compound (VOC) emissions below major source threshold of 50 tons per year (tpy). Computer spreadsheets will be maintained to track VOC containing purchases and amounts used monthly such that VOC will not exceeding 40 tpy. Records will be kept on a current 12-month rolling total and reported annually.

VOC emissions are based on the following:

Boilers (Emission Unit: B-07A08) and Catalytic Oxidizer (Emission Unit: C-SPRDS, Emission Source: CATOX) fuel usage using AP-42 Chapter 1: External Combustion Sources, emission factors.

Churn and Spreading (C-00113 and C-SPRDS) solvent

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processed. For the Churn Room emissions (C-00113) assume Toluene and MEK evaporation rates of 3% and 4%, respectively. Remaining solvents (Spreader emissions) are ducted to the Catalytic Oxidizer which has a 90% control efficiency based on stack testing. Bypass emissions without control (C-SPRDS Process BYP) are allowed up to 100 hours per year.

C-INSIG milling and mixing processes (BOL and MIL) material throughput data using AP-42. Section 4.12: Manufacture of Rubber Products emission factors.

C-INSIG vulcanizing process (VUL) material throughput data using AP-42. Section 4.12: Manufacture of Rubber Products emission factors.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: SOLVENT

Upper Permit Limit: 40 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 13: Capping Monitoring Condition
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 13.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
40 CFR Part 63, Subpart U
40 CFR Part 63, Subpart OOOO

Item 13.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 13.3:

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

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other state and federal air pollution control requirements, regulations or law.

Item 13.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 13.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 13.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 13.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Chemprene is proposing to limit Hazardous Air Pollutions (HAPs) emissions below major source threshold of 25 tons per year (tpy). Computer spreadsheets will be maintained to track HAPs containing purchases and amounts used monthly such that total HAPs not exceeding 24 tpy. Records will be kept on a current 12-month rolling total and reported annually.

HAPs emissions are based on the following:

Boilers (Emission Unit: B-07A08) and Catalytic Oxidizer (Emission Unit: C-SPRDS, Emission Source: CATOX) fuel usage using AP-42 Chapter 1: External Combustion Sources, emission factors.

Churn and Spreading (C-00113 and C-SPRDS) solvent processed. For the Churn Room emissions (C-00113) assume Toluene and Methyl Ethyl Ketone (MEK) evaporation rates of 3% and 4%, respectively. Remaining solvents (Spreader emissions) are ducted to the Catalytic Oxidizer which has a 90% control efficiency based on stack testing. Bypass emissions without control (C-SPRDS Process BYP) are allowed up to 100 hours per year.

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C-INSIG milling and mixing processes (BOL and MIL) material throughput data using AP-42. Section 4.12: Manufacture of Rubber Products emission factors.

C-INSIG vulcanizing process (VUL) material throughput data using AP-42. Section 4.12: Manufacture of Rubber Products emission factors.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: SOLVENT

Upper Permit Limit: 24 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 14: Capping Monitoring Condition
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 14.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

Item 14.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 14.3:

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.

Item 14.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

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Item 14.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 14.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
 CAS No: 0NY075-00-0 PARTICULATES

Item 14.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
 Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:
 Chemprene is proposing to limit the emissions of total particulates (as PM 2.5 and PM-10) below major source threshold of 100 tons per year. To ensure compliance with the facility-wide particulates limit the facility will maintain records of fuel and material throughput data on a current 12-month rolling total and reported annually.

Particulate emissions are based on the following:

Boilers (Emission Unit: B-07A08) and Catalytic Oxidizer (Emission Unit: C-SPRDS, Emission Source: CATOX) fuel usage using AP-42 Chapter 1: External Combustion Sources, emission factors.

C-INSIG emission unit milling and mixing processes with fabric filter (BOL and MIL), material throughput data using AP-42. Section 4.12: Manufacture of Rubber Products emission factors.

C-INSIG dusting process (YAR) material throughput data using AP-42, CH 11.26: Talc Processing emission factor (assuming final product loading with fabric filter).

Work Practice Type: PROCESS MATERIAL THRUPUT
 Process Material: MATERIAL
 Upper Permit Limit: 95 tons per year
 Monitoring Frequency: MONTHLY
 Averaging Method: ANNUAL MINIMUM ROLLED MONTHLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2023.

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

Condition 15: Visible Emissions Limited
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 211.2

Item 15.1:

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

Condition 16: Compliance Demonstration
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 16.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: C-INSIG

Emission Unit: C-SPRDS

Item 16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall 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.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA RM 9

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 30: Compliance Demonstration
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 212-2.3 (b)

Item 30.1:

The Compliance Demonstration activity will be performed for the Facility.

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Item 30.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Chemprene has evaluated the air toxic impact of the following contaminates based on emission rate potential (ERP), environmental rating (ER) and degree of air cleaning required:

Carbon Disulfide, ER B, Guideline Concentration

*

Hexane, ER B, Guideline Concentration *

MEK, ER B, 90% emission reduction **

Toluene, ER B, 75% emission reduction**

* Using air dispersion modeling demonstrate that the maximum offsite air concentration is less than the applicable AGC/SGC.

** Table 4 - degree of air cleaning required for non-criteria air contaminants

The facility owner or operator shall maintain records indicating the monthly usage of all materials containing these contaminates. Such records must be maintained on site for a period of at least five years, and must be made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 17: Compliance Demonstration

Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 212-2.4 (b)

Item 17.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: C-INSIG

Emission Unit: C-SPRDS

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

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Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: USEPA Reference Test Method 5

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration

Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement: 6 NYCRR 225-1.2 (d)

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners or operators of emission sources that fire distillate oil are limited to a 0.0015 percent sulfur content by weight of the fuel. Compliance with the sulfur-in-fuel limitation is based on fuel vendor receipts. All fuel vendor receipts must be maintained on site or at a Department approved alternative location for a minimum of five years.

Note - Process sources and incinerators must comply with the above requirements on or after July 1, 2023.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL

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Parameter Monitored: SULFUR CONTENT
 Upper Permit Limit: 0.0015 percent by weight
 Monitoring Frequency: PER DELIVERY
 Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2023.
 Subsequent reports are due every 12 calendar month(s).

Condition 19: Compliance Demonstration
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement: 6 NYCRR 227-1.4 (a)

Item 19.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: B-07A08
 Process: RES

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

Operators of oil firing emission sources subject to 6 NYCRR Subpart 227-1 which do not employ a continuous opacity monitor for measuring smoke emissions, shall be required to perform the following:

- 1) Observe the stack for each emission source which is operating on oil once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).
- 2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:
 - date and time of day
 - observer's name
 - identity of the emission point
 - weather conditions
 - was a plume observed?

Inclement weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry.

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3) If the operator observes any visible emissions (other than steam - see below) for two consecutive days while firing oil (the firing of other fuels in between days of firing oil does not count as an interruption in the consecutive days of firing oil), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 20: Compliance Demonstration
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

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- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) clean hand held spray guns by one of the following:
 - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 21: Compliance Demonstration
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement:6 NYCRR 228-1.5 (b)

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Item 21.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: C-SPRDS	
Process: NG2	Emission Source: CATOX
Emission Unit: C-SPRDS	
Process: PRO	Emission Source: CATOX
Regulated Contaminant(s):	
CAS No: 0NY998-00-0	VOC

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

The catalytic oxidizer, used as a control for VOC emissions, shall operate to provide, at a minimum, 90 percent overall removal efficiency.

Chemprene Inc shall conduct a performance test, once every 10 years, during the term of this permit to determine VOC destruction efficiency for compliance purposes. The parameters to be monitored shall be continuously measured and recorded during each performance test.

USEPA Testing Methods to be used are specified below:

Method 25 shall be used to determine VOC concentrations from incinerator gas streams. Alternative Methods (18 or 25A), may be used as explained in the applicability section of Method 25 in cases where use of Method 25 is demonstrated to be technically infeasible. The owner or operator shall submit notice of the intended test method to the Administrator for approval along with the notification of the performance test required under §60.8(d) of the General Provisions. The test shall consist of three separate runs, each lasting a minimum of 30 minutes. Method 1 or 1A is used for sample and velocity traverses; Method 2, 2A, 2C, or 2D is used for velocity and volumetric flow rates; Method 3 is used for gas analysis; Method 4 is used for stack gas moisture; Methods 2, 2A, 2C, or 2D; 3; and 4 shall be performed, as applicable, at least twice during each test run.

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For performance test purposes, sampling ports, platforms and access shall be provided by the facility on the combustion exhaust system in accordance with 40 CFR Part 60.8(e).

At least 60 days prior to actual testing, the facility shall submit to the NYSDEC protocol detailing methods and procedures to be used during the performance stack testing.

Results of emissions testing must be submitted to NYSDEC within 60 days after completion of performance tests. The performance test report shall include appropriate temperature recordings correlated with destruction efficiency determinations, as specified in other permit conditions (6 NYCRR 228.1.6(f)(2)). Operation during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

Additional performance testing may be required at the discretion of the NYSDEC.

Parameter Monitored: VOC

Lower Permit Limit: 90 percent degree of air cleaning or greater

Reference Test Method: See Description

Monitoring Frequency: ONCE EVERY TEN YEARS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 22: Compliance Demonstration
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement: 6 NYCRR 228-1.5 (b)

Item 22.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: C-SPRDS

Process: NG2

Emission Source: CATOX

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In the event the utility company curtails fuel supply to the catalytic oxidizer between the period of November 1st

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through March 31st for the purposes of natural gas conservation, the facility shall alert the Department within 10 days of such notification.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 23: Compliance Demonstration
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable Federal Requirement: 6 NYCRR 228-1.6 (f) (2)

Item 23.1:

The Compliance Demonstration activity will be performed for the facility:
The Compliance Demonstration applies to:

Emission Unit: C-SPRDS

Process: NG2

Emission Source: CATOX

Emission Unit: C-SPRDS

Process: PRO

Emission Source: CATOX

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 23.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Chemprene Inc shall continue to operate the inlet catalytic incinerator bed temperature at a minimum of 600 degrees Fahrenheit. An inlet bed temperature of 600 degrees F has been correlated through previous stack testing with a destruction efficiency of at least 90%.

A temperature rise across the bed shall be maintained. To ensure temperature difference, a monitoring device that continuously indicates and records the gas temperature both upstream and downstream of the catalyst bed shall calibrated, maintained, and operated according to the manufacturer's specifications.

Continuous monitors must be operated at all times when the associated process equipment is operating except during any quality assurance and routine maintenance activities. Recorded data shall be kept on site for a period of 5 years and made available upon the Departments request.

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The Catalytic Oxidizer shall be energy efficient and operated in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards, and procedures, inclusive of manufacturer's specifications. The Department reserves the right to require the facility conduct future performance testing to verify VOC capture and control efficiencies.

The facility shall verify and submit certification of proper operation of the control device annually. Submission of the actually monitoring temperatures recorded is not required unless requested by the Department.

Chemprene Inc shall keep record of the date, time and duration of all periods the oxidizer was not in operation during the normal operations of the equipment that it controls including startup/shutdown, malfunction or curtailment (limit of 100 hours annually as specified in other conditions). These downtime events shall be reported to the Department annually.

Malfunction/maintenance events over 4 days shall require written notification to the Department within 30 days of repair/completion of maintenance. These notifications shall describe the date, time, duration, cause, corrective action and summary of emissions related to production activity during the downtime event.

Parameter Monitored: TEMPERATURE
 Lower Permit Limit: 600 degrees Fahrenheit
 Monitoring Frequency: CONTINUOUS
 Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT
 DURING STARTUP/SHUTDOWN
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2023.
 Subsequent reports are due every 12 calendar month(s).

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STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction provision contained in any applicable requirement.

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance

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with 6 NYCRR Part 616 - Public Access to Records.
Facility owners and/or operators must submit the records
required to comply with the request within sixty working
days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 24: Contaminant List

Effective between the dates of 11/16/2022 and 11/15/2032

Applicable State Requirement: ECL 19-0301

Item 24.1:

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

CAS No: 000078-93-3
Name: METHYL ETHYL KETONE

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 0NY075-00-0
Name: PARTICULATES

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CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 25: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable State Requirement: 6 NYCRR 201-1.4

Item 25.1:

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

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

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

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

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

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Condition 26: Emission Unit Definition

Effective between the dates of 11/16/2022 and 11/15/2032

Applicable State Requirement:6 NYCRR Subpart 201-5**Item 26.1:**

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

Emission Unit: B-07A08

Emission Unit Description:

Two (2) 20.9 MMBTU/hr Cleaver Brooks boilers firing natural gas and No. 2 fuel oil as a back-up fuel. Boilers are used to produce facility heat and steam for process operations.

Building(s): BOILERRM

Item 26.2:

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

Emission Unit: C-00113

Emission Unit Description:

Methyl Ethyl Ketone (MEK) or Toluene is mixed with rubber in numerous small vessels and individual automated working stations to make rubber cement for coating in the churn room. Under negative pressure, fugitive room emissions, vessel, and station emissions are vented directly to the atmosphere through emissions point (00113).

Building(s): PROBDG

Item 26.3:

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

Emission Unit: C-INSIG

Emission Unit Description:

- * Bolling Mixer (Process BOL, Source OBMIX) with associated outdoor baghouse (Control BAGBL, Emissions Point 00003)
- * Yards goods duster (Process YAR, Source YDUST) with associated outdoor baghouse (Control YDBAG, Emissions Point 00005)
- * Light mill (Source LMILL) vented directly to atmosphere (Process MIL, Emissions Point 00001)
- *Five vulcanizing lines, three continuous and two batch processes fueled by steam or electric, (one of the five fires natural gas or No. 2 fuel), whereas rubber and fabric are pressed together and subjected to heat in order to carry out the vulcanizing reaction (Process VUL, Emissions Point 00004)

Also a variety of exempt source exhausting indoors including;

- *Dicing of rubber into smaller pieces with associated indoor dust collector.

- *Calendering process involving coating solid rubber onto

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fabric. Sometimes during this process a zinc stearate dust is applied to the rubber after coating with indoor baghouse.

*Plastic liner reprocessing.

*Mica dusting of belts to prevent sticking with associated indoor baghouse.

Building(s): PROBDG

Item 26.4:

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

Emission Unit: C-SPRDS

Emission Unit Description:

Five knife over roll coaters fuel by steam whereby textiles are coated with rubber cement mixtures. Coated textiles are dried in electric ovens or steam powered ovens. There are no emissions associated with the operation of the ovens.

Emissions from the drying process are ducted to a catalytic oxidizer (Source CATOX) fueled by natural gas (propane as a backup fuel). The catalytic oxidizer will be bypassed no more than 100 hours per year via a bypass stack.

Building(s): PROBDG

**Condition 27: Renewal deadlines for state facility permits
Effective between the dates of 11/16/2022 and 11/15/2032**

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

Item 27.1:

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

**Condition 28: Compliance Demonstration
Effective between the dates of 11/16/2022 and 11/15/2032**

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

Item 28.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control

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Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 3
21 South Putt Corners Rd.
New Paltz, NY 12561

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 12/15/2023 for the period 11/16/2022 through 11/15/2023

Condition 29: Air pollution prohibited
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable State Requirement:6 NYCRR 211.1

Item 29.1:

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

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

Condition 31: Emission Point Definition By Emission Unit
Effective between the dates of 11/16/2022 and 11/15/2032

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 31.1:

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

Emission Unit: B-07A08

Emission Point: 00007

Height (ft.): 35 Diameter (in.): 24
NYTMN (km.): 4596.473 NYTME (km.): 587.502 Building: BOILERRM

Emission Point: 00008

Height (ft.): 35 Diameter (in.): 24
NYTMN (km.): 4596.47 NYTME (km.): 587.499 Building: BOILERRM

Item 31.2:

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

Emission Unit: C-00113

Permit ID: 3-1302-00017/00019

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Emission Point: 00113
 Height (ft.): 16 Diameter (in.): 24
 NYTMN (km.): 4596.509 NYTME (km.): 587.554 Building: PROBDG

Item 31.3:

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

Emission Unit: C-INSIG

Emission Point: 00001
 Height (ft.): 12 Diameter (in.): 18
 NYTMN (km.): 4596.525 NYTME (km.): 587.572 Building: PROBDG

Emission Point: 00003
 Height (ft.): 4 Diameter (in.): 15
 NYTMN (km.): 4596.531 NYTME (km.): 587.58 Building: PROBDG

Emission Point: 00004
 Height (ft.): 26 Diameter (in.): 15
 NYTMN (km.): 4596.447 NYTME (km.): 587.549 Building: PROBDG

Emission Point: 00005
 Height (ft.): 6 Diameter (in.): 21
 NYTMN (km.): 4596.474 NYTME (km.): 587.516 Building: PROBDG

Item 31.4:

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

Emission Unit: C-SPRDS

Emission Point: 00006
 Height (ft.): 41 Diameter (in.): 72
 NYTMN (km.): 4596.495 NYTME (km.): 587.516 Building: PROBDG

Emission Point: BYPS1
 Height (ft.): 12 Diameter (in.): 36
 NYTMN (km.): 4593.624 NYTME (km.): 585.532 Building: PROBDG

**Condition 32: Process Definition By Emission Unit
 Effective between the dates of 11/16/2022 and 11/15/2032**

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 32.1:

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

Emission Unit: B-07A08
 Process: NG1 Source Classification Code: 1-03-006-02
 Process Description:
 Two 20.9 MMBTU/hr Cleaver Brooks CB500 boilers firing natural gas.

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Emission Source/Control: 00B01 - Combustion
Design Capacity: 20.9 million Btu per hour

Emission Source/Control: 00B02 - Combustion
Design Capacity: 20.9 million Btu per hour

Item 32.2:

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

Emission Unit: B-07A08
Process: RES Source Classification Code: 1-03-005-02
Process Description:
Two 20.9 MMBTU/hr Cleaver Brooks CB500 boilers firing No. 2 fuel oil. No.2 fuel oil used as backup fuel only.

Emission Source/Control: 00B01 - Combustion
Design Capacity: 20.9 million Btu per hour

Emission Source/Control: 00B02 - Combustion
Design Capacity: 20.9 million Btu per hour

Item 32.3:

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

Emission Unit: C-00113
Process: CRN Source Classification Code: 3-30-002-14
Process Description:
This process involves the mixing of Methyl Ethyl Ketone (MEK) or Toluene with rubber in order to make a rubber cement for coating of textiles.

Emission Source/Control: 00WRK - Process

Item 32.4:

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

Emission Unit: C-INSIG
Process: BOL Source Classification Code: 3-01-026-14
Process Description:
This process utilizes an internal mixer where elastomer in solid state is blended with compounding ingredients such as powders and oils.

Emission Source/Control: BAGBL - Control
Control Type: FABRIC FILTER

Emission Source/Control: 0BMIX - Process

Item 32.5:

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

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Emission Unit: C-INSIG

Process: MIL

Source Classification Code: 3-01-035-52

Process Description:

In this open mill process, elastomer in solid state is blended with compounding ingredients such as powders and oils.

Emission Source/Control: LMILL - Process

Item 32.6:

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

Emission Unit: C-INSIG

Process: VUL

Source Classification Code: 3-01-018-20

Process Description:

This process consists of five vulcanizing lines, three continuous (VULC3, VULC4, VULC5) and two batch processes (VULC1, VULC2) fueled by steam or electric, except for VULC3 which runs on natural gas or No. 2 fuel, whereas rubber and fabric are pressed together and subjected to heat in order to carry out the vulcanizing reaction.

Emission Source/Control: VULC1 - Process

Emission Source/Control: VULC2 - Process

Emission Source/Control: VULC3 - Process

Emission Source/Control: VULC4 - Process

Emission Source/Control: VULC5 - Process

Item 32.7:

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

Emission Unit: C-INSIG

Process: YAR

Source Classification Code: 3-01-888-01

Process Description:

In this process talc or starch dust is applied to a rubber coated fabric.

Emission Source/Control: YDBAG - Control

Control Type: FABRIC FILTER

Emission Source/Control: YDUST - Process

Item 32.8:

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

Emission Unit: C-SPRDS

Process: BYP

Source Classification Code: 3-01-026-11

Process Description:

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This process consists of five (5) knife-over-roll coaters/spreaders fueled by steam whereby various purchased textiles are coated with a rubber cement mixture and emissions are bypassed directly into the atmosphere.

Emission Source/Control: S0001 - Process

Emission Source/Control: S0002 - Process

Emission Source/Control: S0003 - Process

Emission Source/Control: S0005 - Process

Emission Source/Control: S0006 - Process

Item 32.9:

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

Emission Unit: C-SPRDS

Process: NG2

Source Classification Code: 3-99-900-13

Process Description: Catalytic oxidizer fueled by natural gas.

Emission Source/Control: CATOX - Control

Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: S0001 - Process

Emission Source/Control: S0002 - Process

Emission Source/Control: S0003 - Process

Emission Source/Control: S0005 - Process

Emission Source/Control: S0006 - Process

Item 32.10:

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

Emission Unit: C-SPRDS

Process: PRO

Source Classification Code: 3-90-010-89

Process Description: Catalytic oxidizer fueled by propane.

Emission Source/Control: CATOX - Control

Control Type: CATALYTIC AFTERBURNER

Emission Source/Control: S0001 - Process

Emission Source/Control: S0002 - Process

Emission Source/Control: S0003 - Process

Emission Source/Control: S0005 - Process

Permit ID: 3-1302-00017/00019

Facility DEC ID: 3130200017

Emission Source/Control: S0006 - Process

Permit ID: 3-1302-00017/00019

Facility DEC ID: 3130200017