



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 3-3334-00106/00001
Effective Date: 03/11/2015 Expiration Date: 03/10/2025

Permit Issued To: CARLISLE CONSTRUCTION MATERIAL INCORPORATED
1285 RITNER HWY
CARLISLE, PA 17013

Contact: CHRIS SAGER
CARLISLE CONSTRUCTION MATERIALS
1275 RITNER HIGHWAY
CARLISLE, PA 17013
(717) 245-7055

Facility: CARLISLE CONSTRUCTION MATERIALS
9 HUDSON CROSSING DR
MONTGOMERY, NY 12549

Contact: MARC GANNON
CARLISLE CONSTRUCTION MATERIALS
9 HUDSON CROSSING DR
MONTGOMERY, NY 12549
(845) 457-6402

Description:

Carlisle Construction Materials Incorporated is a rigid foam manufacturing facility located in the Town of Hamptonburgh, Orange County. The facility manufactures polyisocyanurate foam panels (two lines) for use in commercial and industrial roofing applications.

The polyisocyanurate foam insulating panels are produced by reacting polyol in a blend of fire retardant and catalyst with polymeric diphenylmethane diisocyanate (PMDI). Pentane material is used as an expanding or blowing agent. Panels are formed by combining the materials at a pour table and lamination process (front end). Pentane emissions (volatile organic compound) are collected during the pour and lamination process and controlled by a regenerative thermal oxidizer. Manufactured insulation panels are cut and trimmed to meet dimensional requirements for industry and customer specification. A dust collection system captures particulates generated during sawing and trimming operations (back end) which are controlled by a baghouse filter unit.

The insulating foam process is subject to 6NYCRR Part 212 - General Process requirements. Volatile Organic Compound emissions are limited below major stationary source thresholds supported by the proper operation of the regenerative thermal oxidizer. Performance testing of the regenerative thermal oxidizer is required to determine operating parameters.



The Standard Industrial Classification representative of this facility is 3086 - Plastics Foam Product.

Ren 1

Renewal addresses a change to the emission factors for the existing ISO process lines. Initial emission factors proposed with the original application were based on data from other Hunter Panels facilities. Formal compliance testing on Line 1 and engineering evaluations on both lines have been conducted and a slight increase in the emission factors associated with the current processes is necessary.

The Insulfoam EPS operation was never installed at the facility and CCM has eliminated plans to add this process to the Montgomery facility. All components of the permit associated with the EPS process shall be removed.

In addition, a second regenerative thermal oxidizer is being brought onsite in order to keep VOC emissions below the 49.5 tons per year cap. The RTO will be used to destroy VOC emissions routed from the sawing and trimming operations (back end), which are currently uncontrolled. An alternate operating scenario gives the facility the option to allow the "back end" exhaust flow from Line 2 to bypass thermal oxidizer HRTO2 and be vented to atmosphere directly after passing through baghouse HBF02, as long as total VOC emissions remain below 49.5 tpy.

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: GEORGE A SWEIKERT
 NYSDEC - REGION 3
 21 S PUTT CORNERS RD
 NEW PALTZ, NY 12561-1696

Authorized Signature: _____ Date: ____ / ____ / ____



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.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

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



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 expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for 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.



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



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: CARLISLE CONSTRUCTION MATERIAL INCORPORATED
1285 RITNER HWY
CARLISLE, PA 17013

Facility: CARLISLE CONSTRUCTION MATERIALS
9 HUDSON CROSSING DR
MONTGOMERY, NY 12549

Authorized Activity By Standard Industrial Classification Code:
3086 - PLASTICS FOAM PRODUCTS

Permit Effective Date: 03/11/2015

Permit Expiration Date: 03/10/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.7: Maintenance of Equipment
- 2 6 NYCRR 202-1.1: Required Emissions Tests
- 3 6 NYCRR 200.7: Compliance Demonstration
- 4 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 6 6 NYCRR 202-1.1: Compliance Demonstration
- 7 6 NYCRR 202-1.1: Compliance Demonstration
- 8 6 NYCRR 211.1: Air pollution prohibited
- 9 6 NYCRR 212.11 (b) (1): Compliance Demonstration
- 10 40CFR 60.4, NSPS Subpart A: EPA Region 2 address.
- 11 40CFR 60.7(a), NSPS Subpart A: Date of construction notification -
If a COM is not used.
- 12 40CFR 60.7(b), NSPS Subpart A: Recordkeeping requirements.
- 13 40CFR 60.7(f), NSPS Subpart A: Facility files for subject sources.
- 14 40CFR 68.10(a), Subpart A: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 15 ECL 19-0301: Contaminant List
- 16 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 17 6 NYCRR Subpart 201-5: Emission Unit Definition
- 18 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 19 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 20 6 NYCRR 211.2: Visible Emissions Limited
- 21 6 NYCRR 212.4 (c): Compliance Demonstration
- 22 6 NYCRR 212.6 (a): Compliance Demonstration

Emission Unit Level

- 23 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 24 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** 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,



required to operate such device effectively.

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;
- (3) During the period of the emergency the facility owner and/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 and/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 and/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 F: 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 G: 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 H: 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 I: Proof of Eligibility for Sources Defined as Trivial 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 J: Required Emission Tests - 6 NYCRR 202-1.1



Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement:6 NYCRR 200.7

Item 1.1:

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, required to operate such device effectively.

Condition 2: Required Emissions Tests
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 2.1:

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 3: Compliance Demonstration
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement:6 NYCRR 200.7

Item 3.1:

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

Emission Unit: H-00001 Emission Point: HBF01

Emission Unit: H-00001 Emission Point: HBF02

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

Item 3.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility shall operate and maintain a magnehelic gauge (or equivalent) to measure pressure differential of each onsite baghouse. Maintenance and or replacement of filter media shall be conducted in accordance with good engineering practice and manufacturer

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specification.

Operating parameters of the magnehelic gauge (or equivalent) shall conform with manufacturer specification.

The facility shall monitor operations by recording pressure differential readings at least daily. Records shall be maintained by the facility and made available to the Department upon request.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 10 inches of water

Monitoring Frequency: DAILY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED PER OCCURRENCE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 4: Facility Permissible Emissions
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 4.1:

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: 0NY998-00-0

PTE: 99,000 pounds per year

Name: VOC

Condition 5: Capping Monitoring Condition
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 5.1:

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

6 NYCRR 231-5.1

Item 5.2:

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

Item 5.3:

The owner or operator of the permitted facility must maintain all required records on-site for a



Eiso2a = Line 2 alternate, ISO process emission factor
(2.6% by weight)

F = total pounds of footers produced each month

Eftr = footer production emission factor (0.024% by
weight)

A = total pounds of auxiliary cut products produced each
month

Eaux = auxiliary cut products emission factor (0.02% by
weight)

The alternate operating scenario for Line 2 gives the
facility the option to allow the exhaust flow from Line 2
to bypass thermal oxidizer HRTO2 and be vented to
atmosphere directly after passing through baghouse HBF02,
as long as total VOC emissions remain below 49.5 tpy.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: MATERIAL

Parameter Monitored: VOC

Upper Permit Limit: 99000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 6: Compliance Demonstration
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 6.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: H-00001

Process: ISO

Emission Source: HRTO2

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility shall maintain the VOC destruction efficiency
of the new Regenerative Thermal Oxidizer (HRTO2) at or
above 95%. The Department reserve the right to require
performance testing in the future.



Lower Permit Limit: 95 percent reduction
Reference Test Method: EPA Accepted Methods
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: Arithmetic average of stack test runs
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 7: Compliance Demonstration
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement: 6 NYCRR 202-1.1

Item 7.1:

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

Emission Unit: H-00001
Process: ISO Emission Source: HRT01

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

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

Within 60 days after achieving the maximum production rate of the ISO production lines, but no later than 180 days after initial startup as defined in 40 CFR Part 60.2, the facility shall conduct initial performance tests to determine the destruction efficiency of Volatile Organic Compounds vented to each regenerative thermal oxidizer.

At least 60 days prior to actual testing, the facility shall submit to the Department a Test Protocol detailing methods and procedures to be used during the performance stack testing.

Performance tests to determine the stack gas velocity, sample area, volumetric flow rate, molecular composition, excess air of flue gases, and moisture content of flue gas shall be conducted using 40 CFR Part 60, Appendix A, Methods 1, 2, 3 and 4. Emissions of Volatile Organic Compounds shall be conducted using 40 CFR Part 60, Appendix A, Method 25A.

Performance test results must be reported to the Department within 60 days after completion of compliance



testing. The results shall be coordinated with implementation of the facility cap defined by a separate permit condition under 201-7.

Subsequent testing shall be performed as requested by the Department.

The facility shall define the minimum operating set point temperature which will support destruction efficiency determinations. The established operating temperature set points shall be used as a surrogate for future compliance and become enforceable under the terms of this permit. The facility shall measure these temperatures continuously and maintain records available to the Department upon request.

Performance testing was conducted on 11/26/13 for RTO 1 (HRT01). Average VOC destruction efficiency over three runs was 98.94%. Set point temperature during testing was 1450°F. HRT01 is required to maintain a minimum destruction efficiency of 98%.

Minimum operating set point temperature is provided under the new 212.11(b)(1) condition.

Lower Permit Limit: 98 percent reduction
Reference Test Method: See above
Monitoring Frequency: SINGLE OCCURRENCE
Averaging Method: Arithmetic average of stack test runs
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 8: Air pollution prohibited
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 8.1:
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.

Condition 9: Compliance Demonstration
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement:6 NYCRR 212.11 (b) (1)

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Facility DEC ID: 3333400106



Item 9.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: H-00001

Process: ISO

Emission Source: HRT01

Emission Unit: H-00001

Process: ISO

Emission Source: HRTO2

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 9.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

As required in the 6 NYCRR 202-1.1 condition, a minimum set point temperature for the regenerative thermal oxidizers has been established from performance tests conducted on 11/26/13. The set point temperature shall not be set below 1500°F. Actual operating temperature may oscillate above or below this set point temperature, as long as destruction efficiency remains at or above 98% for HRT01 and 95% for HRTO1. This temperature parameter must be continuously monitored and recorded on an electronic chart recorder. These records shall be maintained onsite and made available to the Department upon request.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1500 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: EPA Region 2 address.

Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement:40CFR 60.4, NSPS Subpart A

Item 10.1:

All requests, reports, applications, submittals, and other communications to the Administrator pursuant to this part shall be submitted in duplicate to the following address:

Director, Division of Enforcement and Compliance Assistance
USEPA Region 2
290 Broadway, 21st Floor
New York, NY 10007-1886



Applicable Federal Requirement:40CFR 60.7(f), NSPS Subpart A

Item 13.1:

The following files shall be maintained at the facility for all affected sources: all measurements, including continuous monitoring systems, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this part, recorded in permanent form suitable for inspections. The file shall be maintained for at least two years following the date of such measurements, reports, and records.

Condition 14: Compliance Demonstration
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable Federal Requirement:40CFR 68.10(a), Subpart A

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000109-66-0 PENTANE

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The facility is subject to 40 CFR Part 68 - Chemical Accident Prevention Provisions. The regulated substance is pentane storage greater than 10,000 gallons. Applicable registrations and Risk Management Plan shall be submitted directly to USEPA as required by separate permit conditions under 40 CFR Part 68.

This requirement shall incorporate the family of contaminants or blend including N-Pentane, ISO-Pentane and Cyclo-Pentane.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 15: Contaminant List
Effective between the dates of 03/11/2015 and 03/10/2025



Applicable State Requirement:ECL 19-0301

Item 15.1:

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

CAS No: 000109-66-0

Name: PENTANE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

**Condition 16: Malfunctions and start-up/shutdown activities
Effective between the dates of 03/11/2015 and 03/10/2025**

Applicable State Requirement:6 NYCRR 201-1.4

Item 16.1:

(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 malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, 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 stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and 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. 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, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the 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.

Condition 17: Emission Unit Definition
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1:

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

Emission Unit: H-00001

Emission Unit Description:

Polyisocyanurate (ISO) foam manufacturing process consisting of two lines. Each line includes a pour table, a laminator and a panel sawing station. A footer saw and auxiliary saw supports the operation. Emissions from the process include VOC from the pour tables, laminators, and panel sawing stations; and particulate from the panel sawing station. Existing RTO, HRTO1, controls VOC emissions from the pour tables and laminator operations. There is an additional RTO being proposed, HRTO2, to control VOC emissions from the panel cutting operations for each line. Particulate emissions from each panel sawing station and footer saw are collected and controlled by two high efficiency particulate bag filters. An alternate operating scenario gives the facility the option to allow the back end exhaust flow from Line 2 to bypass thermal oxidizer HRTO2 and be vented to atmosphere directly after passing through baghouse HBF02, as long as total VOC emissions remain below 49.5 tpy.

Building(s): Main

Item 17.2:

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

Emission Unit: H-00002

Emission Unit Description:

Nine chemical tanks used to store raw materials for the polyisocyanurate foam panel manufacturing process. The inventory of tanks consist of three MDI tanks, three Polyol tanks, a Flame Retardant tank, a Potassium Octoate tank and a Surfactant tank. All tanks operate at or slightly above ambient temperatures. Stored materials are of low vapor pressure. Total emissions from all tanks are estimated as less than 0.02 lbs per hour and less than 200 lbs per year.

Condition 18: Renewal deadlines for state facility permits



Effective between the dates of 03/11/2015 and 03/10/2025

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

Item 18.1:

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 19: Compliance Demonstration
Effective between the dates of 03/11/2015 and 03/10/2025

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

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 19.2:

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 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 (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

Condition 20: Visible Emissions Limited
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable State Requirement:6 NYCRR 211.2

Item 20.1:

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 21: Compliance Demonstration
Effective between the dates of 03/11/2015 and 03/10/2025



Applicable State Requirement:6 NYCRR 212.4 (c)

Item 21.1:

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

Emission Unit: H-00001 Emission Point: HBF01

Emission Unit: H-00001 Emission Point: HBF02

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

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to request performance testing to demonstrate compliance.

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 22: Compliance Demonstration
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable State Requirement:6 NYCRR 212.6 (a)

Item 22.1:

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

Emission Unit: H-00001 Emission Point: HBF01

Emission Unit: H-00001 Emission Point: HBF02

Emission Unit: H-00001 Emission Point: HRT01

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL



DEVICE PARAMETERS AS SURROGATE
Monitoring Description:

The facility shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**** Emission Unit Level ****

Condition 23: Emission Point Definition By Emission Unit
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 23.1:

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

Emission Unit: H-00001

Emission Point: HBF01

Height (ft.): 45 Length (in.): 72 Width (in.): 60
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HBF02

Height (ft.): 45 Length (in.): 72 Width (in.): 60
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HRT01

Height (ft.): 35 Diameter (in.): 36
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HRTO2

Height (ft.): 40 Diameter (in.): 76
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Item 23.2:

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

Emission Unit: H-00002

New York State Department of Environmental Conservation

Permit ID: 3-3334-00106/00001

Facility DEC ID: 3333400106



Emission Point: HFTK1
Height (ft.): 19 Diameter (in.): 4
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HMTK1
Height (ft.): 27 Diameter (in.): 4
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HMTK2
Height (ft.): 27 Diameter (in.): 4
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HMTK3
Height (ft.): 27 Diameter (in.): 4
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HOTK3
Height (ft.): 19 Diameter (in.): 4
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HPTK1
Height (ft.): 27 Diameter (in.): 4
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HPTK2
Height (ft.): 27 Diameter (in.): 4
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HPTK3
Height (ft.): 27 Diameter (in.): 4
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Emission Point: HSTK1
Height (ft.): 19 Diameter (in.): 4
NYTMN (km.): 4593.169 NYTME (km.): 563.042

Condition 24: Process Definition By Emission Unit
Effective between the dates of 03/11/2015 and 03/10/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1:

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

Emission Unit: H-00001

Process: ISO

Process Description:

Polysocyanurate foam manufacturing process. Exhaust flows from bagfilters HBF01 and HBF02 will be exhausted to the proposed thermal oxidizer, HRTO2. All other emission point routes shall remain unchanged.



An alternate operating scenario gives the facility the option to allow the back end exhaust flow from Line 2 to bypass thermal oxidizer HRT02 and be vented to atmosphere directly after passing through baghouse HBF02, as long as total VOC emissions remain below 49.5 tpy.

Emission Source/Control: HBF01 - Control
Control Type: FABRIC FILTER

Emission Source/Control: HBF02 - Control
Control Type: FABRIC FILTER

Emission Source/Control: HRT01 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: HRT02 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: HAUX1 - Process
Design Capacity: 764 pounds per hour

Emission Source/Control: HFTR1 - Process
Design Capacity: 600 pounds per hour

Emission Source/Control: HLAM1 - Process
Design Capacity: 12,000 pounds per hour

Emission Source/Control: HLAM2 - Process
Design Capacity: 12,000 pounds per hour

Emission Source/Control: HPT01 - Process
Design Capacity: 12,000 pounds per hour

Emission Source/Control: HPT02 - Process
Design Capacity: 12,000 pounds per hour

Emission Source/Control: HSAW1 - Process
Design Capacity: 12,000 pounds per hour

Emission Source/Control: HSAW2 - Process
Design Capacity: 12,000 pounds per hour

Item 24.2:

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

Emission Unit: H-00002

Process: HTK

Process Description:

Storage of raw materials needed for the Polyisocyanurate foam manufacturing process.

New York State Department of Environmental Conservation

Permit ID: 3-3334-00106/00001

Facility DEC ID: 3333400106



Emission Source/Control: HFTK1 - Process
Design Capacity: 16,000 gallons

Emission Source/Control: HMTK1 - Process
Design Capacity: 30,000 gallons

Emission Source/Control: HMTK2 - Process
Design Capacity: 30,000 gallons

Emission Source/Control: HMTK3 - Process
Design Capacity: 30,000 gallons

Emission Source/Control: HOTK1 - Process
Design Capacity: 16,000 gallons

Emission Source/Control: HPTK1 - Process
Design Capacity: 30,000 gallons

Emission Source/Control: HPTK2 - Process
Design Capacity: 30,000 gallons

Emission Source/Control: HPTK3 - Process
Design Capacity: 30,000 gallons

Emission Source/Control: HSTK1 - Process
Design Capacity: 16,000 gallons

