

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility Permit ID: 4-2720-00086/00007

Mod 0 Effective Date: 01/16/2019 Expiration Date: 01/15/2029

Mod 1 Effective Date: 12/03/2019 Expiration Date: 01/15/2029

Mod 2 Effective Date: 10/07/2022 Expiration Date: 01/15/2029

Mod 3 Effective Date: 03/08/2023 Expiration Date: 01/15/2029

Mod 4 Effective Date: 07/31/2023 Expiration Date: 01/15/2029

Mod 5 Effective Date: 01/09/2024 Expiration Date: 01/15/2029

Permit Issued To: The Gund Company

200 Wallins Corners Rd Amsterdam, NY 12010

Contact: John W Craft

200 Wallins Corners Rd Amsterdam, NY 12010-1819

(518) 843-6825

Facility: PCT A Division of the Gund Company

200 WALLINS CORNERS RD AMSTERDAM, NY 12010

Contact: John W Craft

200 Wallins Corners Rd Amsterdam, NY 12010-1819

(518) 843-6825

Description:

This minor permit modification (#5) will reinstate the emission point (00207 now 00209) associated with dust collector F207A in building #2. This minor permit modification also includes the removal of emission point 00107 and replacement of the current dust collection system associated with process 107 with a new Donaldson Torit DFE 4-48 dust collector. The new unit will service the same manufaturing operations as the existing dust collector; therefore, no changes to the facility's emission profile are noted. The new dust collector will be assigned Emission Control ID DUST2, and two new emission points will be assigned with its operation. The new emission points are given Emission Point IDs 00116 and 00117.

Division of Air Resources



Facility DEC ID: 4272000086

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:	KATE MALCOLM				
	NYSDEC - REGION 4				
	1130 N WESTCOTT RD				
	SCHENECTADY, NY 12306-2014				
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.



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DEC GENERAL CONDITIONS

General Provisions

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- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Permit modifications, suspensions or revocations by the Department **Facility Level**
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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.

Item3.2:

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.

Division of Air Resources



Facility DEC ID: 4272000086

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 4
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 4 Headquarters Division of Environmental Permits 1130 North Westcott Rd. Schenectady, NY 12306-2014 (518) 357-2069



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:The Gund Company

200 Wallins Corners Rd Amsterdam, NY 12010

Facility: PCT A Division of the Gund Company

200 WALLINS CORNERS RD AMSTERDAM, NY 12010

Authorized Activity By Standard Industrial Classification Code:

3089 - PLASTICS PRODUCTS, NEC

Mod 0 Permit Effective Date: 01/16/2019 Permit Expiration Date: 01/15/2029

Mod 1 Permit Effective Date: 12/03/2019 Permit Expiration Date: 01/15/2029

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NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/Mod 5/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,



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



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)



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: Prohibition of Reintroduction of Collected Contaminants to the air

Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 201-1.8

Item 1.1:

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 2: Compliance Demonstration Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 201-1.8

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2 2.

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility owner or operator shall ensure that each collection bin, bag, hopper, drum, or other container for emptying collected material from an air pollution control device is covered or sealed at all times to prevent the reintroduction of collected contaminants to the outdoor environment. The facility owner or operator shall inspect and empty each such container at a frequency necessary to ensure that collected material does not spill, overflow, or otherwise come into contact with the outside environment.

In the event that collected material is spilled for any



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reason, the facility owner or operator shall immediately and completely clean up all spilled material and take appropriate corrective action to minimize or eliminate future spills.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3: Facility Permissible Emissions

Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 3.1:

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:

per year	CAS No: 000080-62-6	(From Mod 5)	PTE:	18,000	pounds
	Name: 2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER				
per year	CAS No: 000100-42-5	(From Mod 5)	PTE:	18,000	pounds
	Name: STYRENE				
per year	CAS No: 000131-11-3	(From Mod 5)	PTE:	18,000	pounds
	Name: DIMETHYL PHTHALATE				
per year	CAS No: 0NY100-00-0	(From Mod 5)	PTE:	40,000	pounds
	Name: TOTAL HAP				
per year	CAS No: 0NY998-00-0	(From Mod 5)	PTE:	80,000	pounds
	Name: VOC				

Condition 4: Capping Monitoring Condition

Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 4.1:

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 WWWW

Item 4.2:

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

Item 4.3:

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 4.4:

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 4.5:

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 4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000080-62-6

2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER

Item 4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility owner or operator shall ensure that emissions of methyl methacrylate do not exceed 18,000 pounds per year (9 tons per year) on a rolling 12-month total basis.

The facility owner or operator shall maintain records indicating the methyl methacrylate content of all products containing methyl methacrylate, the facility's usage of those products on a monthly basis, and all other relevant information necessary to calculate monthly emissions. Such records shall be used to calculate the facility's monthly and rolling 12-month total emissions of methyl



methacrylate.

The facility owner or operator shall calculate methyl methacrylate emissions from the various products manufactured at the facility using the methodology described in the most current version of 'Guidelines for Calculating Emissions from Polyester Resin Operations', as prepared by the South Coast Air Quality Management District, and shall include those emissions as part of the rolling 12-month total. A copy of the reference documents used to perform the calculations shall be maintained on site and updated as necessary.

The facility owner or operator shall prepare and submit an annual capping certification report that includes a summary of the monthly and rolling 12-month total methyl methacrylate emissions from all processes and products at the facility.

Records kept pursuant to this condition must be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Parameter Monitored: 2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER

Upper Permit Limit: 18,000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

Condition 5: Capping Monitoring Condition

Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 201-7.1

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 40 CFR Part 63, Subpart WWWW

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



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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 5.4:

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 5.5:

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 5.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility owner or operator shall ensure that emissions of Total Hazardous Air Pollutants (HAP) do not exceed 40,000 pounds per year (20 tons per year) on a rolling 12-month total basis.

The facility owner or operator shall maintain records indicating the HAP content of all products containing HAP, the facility's usage of those products on a monthly basis, and all other relevant information necessary to calculate monthly emissions. Such records shall be used to calculate the facility's monthly and rolling 12-month total emissions of HAP.

The facility owner or operator shall calculate HAP emissions from the various products manufactured at the facility using the methodology described in the most current version of 'Guidelines for Calculating Emissions from Polyester Resin Operations', as prepared by the South Coast Air Quality Management District, and shall include those emissions as part of the rolling 12-month total. A copy of the reference documents used to perform the



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calculations shall be maintained on site and updated as necessary.

The facility owner or operator shall prepare and submit an annual capping certification report that includes a summary of the monthly and rolling 12-month total HAP emissions from all processes and products at the facility.

Records kept pursuant to this condition must be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 40,000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

Condition 6: Capping Monitoring Condition

Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 6.1:

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 WWWW

Item 6.2:

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

Item 6.3:

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 6.4:

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



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period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 6.5:

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 6.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000131-11-3 DIMETHYL PHTHALATE

Item 6.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility owner or operator shall ensure that emissions of dimethyl phthalate do not exceed 18,000 pounds per year (9 tons per year) on a rolling 12-month total basis.

The facility owner or operator shall maintain records indicating the dimethyl phthalate content of all products containing dimethyl phthalate, the facility's usage of those products on a monthly basis, and all other relevant information necessary to calculate monthly emissions. Such records shall be used to calculate the facility's monthly and rolling 12-month total emissions of dimethyl phthalate.

The facility owner or operator shall calculate dimethyl phthalate emissions from the various products manufactured at the facility using the methodology described in the most current version of 'Guidelines for Calculating Emissions from Polyester Resin Operations', as prepared by the South Coast Air Quality Management District, and shall include those emissions as part of the rolling 12-month total. A copy of the reference documents used to perform the calculations shall be maintained on site and updated as necessary.

The facility owner or operator shall prepare and submit an annual capping certification report that includes a summary of the monthly and rolling 12-month total dimethyl phthalate emissions from all processes and products at the facility.



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Records kept pursuant to this condition must be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Parameter Monitored: DIMETHYL PHTHALATE Upper Permit Limit: 18,000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

Condition 7: Capping Monitoring Condition Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 7.1:

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 WWWW

Item 7.2:

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

Item 7.3:

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 7.4:

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 7.5:

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 7.6:



Permit ID: 4-2720-00086/00007 Facility DEC ID: 4272000086

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000100-42-5 STYRENE

Item 7.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility owner or operator shall ensure that emissions of styrene do not exceed 18,000 pounds per year (9 tons per year) on a rolling 12-month total basis.

The facility owner or operator shall maintain records indicating the styrene content of all products containing styrene, the facility's usage of those products on a monthly basis, and all other relevant information necessary to calculate monthly emissions. Such records shall be used to calculate the facility's monthly and rolling 12-month total emissions of styrene.

The facility owner or operator shall calculate styrene emissions from the various products manufactured at the facility using the methodology described in the most current version of 'Guidelines for Calculating Emissions from Polyester Resin Operations', as prepared by the South Coast Air Quality Management District, and shall include those emissions as part of the rolling 12-month total. A copy of the reference documents used to perform the calculations shall be maintained on site and updated as necessary.

The facility owner or operator shall prepare and submit an annual capping certification report that includes a summary of the monthly and rolling 12-month total styrene emissions from all processes and products at the facility.

Records kept pursuant to this condition must be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Parameter Monitored: STYRENE

Upper Permit Limit: 18,000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



Permit ID: 4-2720-00086/00007 Facility DEC ID: 4272000086

The initial report is due 1/30/2020. Subsequent reports are due every 12 calendar month(s).

Condition 8: Capping Monitoring Condition

Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 8.1:

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 8.2:

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

Item 8.3:

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 8.4:

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 8.5:

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 8.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 8.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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



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Monitoring Description:

The facility owner or operator shall ensure that emissions of Total Volatile Organic Compounds (VOC) do not exceed 80,000 pounds per year (40 tons per year) on a rolling 12-month total basis.

The facility owner or operator shall maintain records indicating the VOC content of all products containing VOC, the facility's usage of those products on a monthly basis, and all other relevant information necessary to calculate monthly emissions. Such records shall be used to calculate the facility's monthly and rolling 12-month total emissions of VOC.

The facility owner or operator shall calculate VOC emissions from the various products manufactured at the facility using the methodology described in the most current version of 'Guidelines for Calculating Emissions from Polyester Resin Operations', as prepared by the South Coast Air Quality Management District, and shall include those emissions as part of the rolling 12-month total. A copy of the reference documents used to perform the calculations shall be maintained on site and updated as necessary.

The facility owner or operator shall prepare and submit an annual capping certification report that includes a summary of the monthly and rolling 12-month total VOC emissions from all processes and products at the facility.

Records kept pursuant to this condition must be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 80,000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

Condition 9: Visible Emissions Limited

Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 211.2

Item 9.1:

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



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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 5-1: **Compliance Demonstration** Effective between the dates of 01/09/2024 and 01/15/2029

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

Replaces Condition(s) 4-1

Item 5-1.1:

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

Emission Unit: A-00001	Emission Point: 00101
Emission Unit: A-00001	Emission Point: 00102
Emission Unit: A-00001	Emission Point: 00107
Emission Unit: A-00001	Emission Point: 00110
Emission Unit: A-00001	Emission Point: 00114
Emission Unit: A-00001	Emission Point: 00115
Emission Unit: A-00001	Emission Point: 00116
Emission Unit: A-00001	Emission Point: 00117
Emission Unit: A-00002	Emission Point: 00202
Emission Unit: A-00002	Emission Point: 00205
Emission Unit: A-00002	Emission Point: 00209
Emission Unit: A-00002	Emission Point: 0204A
Emission Unit: A-00002	Emission Point: 0204B
Regulated Contaminant(s): CAS No: 0NY075-00-0	PARTICULATES

Item 5-1.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source,



except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with section 212-1.6(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and must be made available to the Department upon request.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent

Reference Test Method: EPA Reference Test Method 9

Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9) Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 26: Compliance Demonstration Effective between the dates of 01/16/2019 and 01/15/2029

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

Item 26.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s): CAS No: 000080-62-6



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2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER CAS No: 000131-11-3 DIMETHYL PHTHALATE

CAS No: 000100-42-5 STYRENE

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The production processes at this facility emit styrene, methyl methacrylate, and dimethyl phthalate, which are subject to regulation under 6 NYCRR Subpart 212-2.3(b). These emissions have been assigned the following environmental ratings by the Department:

Styrene - B Methyl Methacrylate - B Dimethyl Phthalate - B

The emission rate potential for these contaminants is between 1 and 10 pounds per hour, so the facility owner or operator is required to demonstrate compliance with the short term and annual guideline concentrations specified in the Department's DAR-1 guidance document. An AERScreen model has indicated that the facility's emissions are in compliance with this requirement based on the data provided as part of this application. Accordingly, no further control of these emissions is required at this time.

The facility owner or operator shall maintain records indicating the monthly usage of all materials containing these compounds, and shall use that information to calculate rolling 12-month total actual emissions of each contaminant listed in this condition. 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.

The facility owner or operator shall notify the Department in writing within 30 days of discovering that the rolling 12-month total actual emissions of one or more of the contaminants listed in this condition equal or exceed the following threshold levels:

Styrene - 8100 pounds Methyl Methacrylate - 200 pounds Dimethyl Phthalate - 700 pounds

Such notification shall include an updated AERScreen modeling analysis indicating that the facility is still meeting the short term and annual guideline concentrations



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specified in the Department's DAR-1 guidance document for each contaminant. If the guideline concentrations cannot be met, the notification shall include a description of the methods the facility owner or operator will use to reduce or control emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5-2: Compliance Demonstration Effective between the dates of 01/09/2024 and 01/15/2029

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

Replaces Condition(s) 4-2

Item 5-2.1:

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

Emission Unit: A-00001

Process: 106 Emission Source: F0106

Emission Unit: A-00002

Process: 202 Emission Source: FI202

Emission Unit: A-00002

Process: 205 Emission Source: FI205

Emission Unit: A-00002

Process: 207 Emission Source: F207A

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 5-2.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Particulate emissions from Emission Point 00106 are limited to 0.05 gr/dscf. The facility owner or operator shall demonstrate continuous compliance with this emission rate by maintaining the pressure drop across the fabric filter in the range specified below.

The facility owner or operator shall monitor the pressure drop across the fabric filter once daily to check that it is within the specified operating range. The facility owner or operator shall maintain a log of the daily pressure drop checks. The log shall include, at a minimum,



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the date and time of each check, the pressure drop reading, any excursions, and a description of any corrective action taken.

The facility owner or operator shall operate and maintain the fabric filter in a manner consistent with manufacturer's instructions and good engineering practice.

Stack testing to demonstrate compliance with the particulate emission standard will be performed at the request of the Department.

Parameter Monitored: PRESSURE DROP Lower Permit Limit: 0 inches of water Upper Permit Limit: 6 inches of water Monitoring Frequency: DAILY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED

RANGE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5-3: Compliance Demonstration Effective between the dates of 01/09/2024 and 01/15/2029

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

Replaces Condition(s) 4-3

Item 5-3.1:

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

Emission Unit: A-00001	Emission Point: 00101
Emission Unit: A-00001	Emission Point: 00102
Emission Unit: A-00001	Emission Point: 00107
Emission Unit: A-00001	Emission Point: 00110
Emission Unit: A-00001	Emission Point: 00114
Emission Unit: A-00001	Emission Point: 00115
Emission Unit: A-00001	Emission Point: 00116
Emission Unit: A-00001	Emission Point: 00117
Emission Unit: A-00002	Emission Point: 00202
Emission Unit: A-00002	Emission Point: 00205
Emission Unit: A-00002	Emission Point: 00209

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Emission Unit: A-00002 Emission Point: 0204A

Emission Unit: A-00002 Emission Point: 0204B

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 5-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility owner or operator shall not cause or allow emissions of solid particulates that exceed 0.050 grains per dry standard cubic foot of exhaust gas from any emission source subject to this condition.

The Department may require the facility owner or operator to perform a stack test in order to demonstrate compliance with this requirement.

Parameter Monitored: PARTICULATES Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Reference Test Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 13: Surface Coating- Prohibitions
Effective between the dates of 01/16/2019 and 01/15/2029

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

Item 13.1:

- (1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:
- (i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;
- (ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and
- (iii) coatings utilized at surface coating lines that have been granted variances pursuant to



Subpart 228-1.5(e).

(2) Any person selling a coating for use in a coating line subject to Subpart 228-1 must, upon request, provide the user with certification of the VOC content of the coating supplied.

Condition 14: Compliance Demonstration Effective between the dates of 01/16/2019 and 01/15/2029

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

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

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;
- (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 1/30/2020.

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

Condition 15: Compliance Demonstration Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 228-2.4 (a)

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Except as provided in 6 NYCRR 228-2.2, no person shall use, apply, solicit, require the use of, specify the application of, sell, supply, offer for sale, or manufacture for sale in the State of New York any commercial or industrial adhesive, sealant, adhesive primer or sealant primer unless such adhesive, sealant, adhesive primer or sealant primer complies with the applicable VOC content limits specified in Table 1 of 6 NYCRR 228-2.4 and the applicable requirements of Subpart 228-2.

For adhesives applied to the listed substrates, the VOC content limits in Table 1 of Subdivision 228-2.4(a) apply as follows:

(1) if an operator uses a commercial or industrial adhesive or sealant subject to a specific VOC content



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limit for such adhesive or sealant in Table 1, such specific limit is applicable rather than an adhesive-to-listed-substrate limit; and

(2) if an adhesive is used to bond dissimilar substrates together, the applicable substrate category with the highest VOC content shall be the limit for such use.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: Compliance Demonstration
Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 228-2.4 (d)

Item 16.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of a facility applying coating materials subject to the requirements of 6 NYCRR Subpart 228-2 shall employ the following work practices to minimize VOC emissions:

- (1) the following types of application equipment, with the use of low-VOC adhesives or adhesive primers: electrostatic spray; HVLP spray; flow coat; roll coat or hand application, including non-spray application methods similar to hand or mechanically powered caulking gun, brush, or direct hand application; dip coat (including electrodeposition); airless spray; air-assisted airless spray; any other adhesive application method, subject to department approval, capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spraying;
- (2) the following work practices for storage, mixing operations, and handling operations for adhesives, thinners, and adhesive-related waste materials that:
- (i) store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers;
- (ii) ensure that mixing and storage containers used for VOC-containing adhesives, adhesive primers, and process related waste materials are kept closed at all times except when depositing or removing these materials;



- (iii) minimize spills of VOC-containing adhesives, adhesive primers, and process related waste materials; and
- (iv) convey VOC-containing adhesives, adhesive primers, and process related waste materials from one location to another in closed containers or pipes.
- (3) the following work practices to reduce VOC emissions from cleaning materials used in industrial adhesive application processes that:
- (i) store all VOC-containing cleaning materials and used shop towels in closed containers;
- (ii) ensure that storage containers used for VOC-containing materials are kept closed at all times except when depositing or removing these materials;(iii) minimize spills of VOC-containing cleaning
- (iii) minimize spills of VOC-containing cleaning materials;
- (iv) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and
- (v) minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration Effective between the dates of 01/16/2019 and 01/15/2029

Applicable Federal Requirement: 6 NYCRR 228-2.5 (a)

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of a facility using products subject to a VOC content limit in 6 NYCRR Part 228-2.4(a) shall maintain records demonstrating compliance with the VOC content limits, including, but not limited to, the following information:

(1) a list of each commercial and industrial adhesive, sealant, adhesive primer, sealant primer cleanup solvent and surface preparation solvent in use and in storage at



the facility;

- (2) identification of each product by product name and description;
- (3) the VOC content of each product as supplied;
- (4) the mix ratio of any catalysts, reducers or other components used;
- (5) the final VOC content or vapor pressure, as applied; and
- (6) the monthly volume of each commercial or industrial adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used at the facility.

The records described above must me maintained at the the facility 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: UPON REQUEST BY REGULATORY AGENCY

**** Emission Unit Level ****

Condition 18: Compliance Demonstration
Effective between the dates of 01/16/2019 and 01/15/2029

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

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00002

Process: 204

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 18.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20



percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). Observations 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 emission point
- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam – see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions persist after corrections are made, the permittee will immediately notify the department and may be required to conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

** 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.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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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



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 19: Contaminant List

Effective between the dates of 01/16/2019 and 01/15/2029

Applicable State Requirement: ECL 19-0301

Item 19.1:

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

CAS No: 000080-62-6

Name: 2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER

CAS No: 000100-42-5 Name: STYRENE

CAS No: 000131-11-3

Name: DIMETHYL PHTHALATE



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

CAS No: 0NY100-00-0 Name: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

Condition 2-1: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 10/07/2022 and 01/15/2029

Applicable State Requirement: 6 NYCRR 201-1.4

Item 2-1.1:

- (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.



Condition 21: Emission Unit Definition
Effective between the dates of 01/16/2019 and 01/15/2029

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 21.1(From Mod 5):

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

Emission Unit: A-00001 Emission Unit Description:

This emission unit consists of operations for the manufacturing of epoxy and polyester fiberglass reinforced resin products using various processes including filament winding, wet lay up, chop spray and vacuum infusion. Cutting, sanding and grinding of polyester and epoxy resin parts is also performed, as well as surface coating (paint and gelcoat) of parts.

The operations included in this emission unit are conducted in Building 1, located at 200 Wallins Corners Road.

Building(s): 1

Item 21.2(From Mod 5):

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

Emission Unit: A-00002 Emission Unit Description:

This emission unit consists of operations for the manufacturing of epoxy and polyester fiberglass reinforced resin products using various processes including filament winding, wet lay up, chop spray and vacuum infusion. Cutting, sanding and grinding of polyester and epoxy resin parts is also performed, as well as surface coating (paint and gelcoat) of parts.

The operations included in this emission unit are conducted in Building 2, located at 119 Genesee Lane.

Building(s): 2

Condition 22: Renewal deadlines for state facility permits Effective between the dates of 01/16/2019 and 01/15/2029

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

Item 22.1:

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 23: Compliance Demonstration Effective between the dates of 01/16/2019 and 01/15/2029

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

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility owner or operator shall develop and implement a standard operating procedure for the operation and maintenance of each dust collection device installed at the facility. Each such dust collection device must be operated and maintained in accordance with the facility's standard operating procedures and manufacturer's specifications.

Additionally, the facility owner or operator shall conduct weekly preventative maintenance checks of each dust collection device and record such inspections in a log. Each log entry shall include the date of the inspection, identification of the device being inspected, and the name or initials of the operator conducting the inspection. If any maintenance or housekeeping issues are discovered during an inspection, the facility owner or operator shall note the issue in the log, take corrective action, and note the corrective action taken in the log.

Each log shall be maintained on site for a period of at least five years from the date of the record, and shall be made available to the Department upon request.

A copy of the standard operating procedures used by the facility shall be maintained on site indefinitely, and shall be updated as necessary to ensure that all facility personnel employ appropriate methods for operating and maintaining each dust collection device installed at the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 24: Compliance Demonstration Effective between the dates of 01/16/2019 and 01/15/2029

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



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Item 24.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 24.2:

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 4 1130 N. Westcott Rd. Schenectady, NY 12306

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

Condition 25: Air pollution prohibited

Effective between the dates of 01/16/2019 and 01/15/2029

Applicable State Requirement: 6 NYCRR 211.1

Item 25.1:

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 27: Emission Point Definition By Emission Unit Effective between the dates of 01/16/2019 and 01/15/2029

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 27.1(From Mod 5):

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

Emission Unit: A-00001

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Emission Point: 00101

Height (ft.): 14 Diameter (in.): 4

NYTMN (km.): 4758.068 NYTME (km.): 566.847 Building: 1

Emission Point: 00102

Height (ft.): 10 Length (in.): 24 Width (in.): 24 NYTMN (km.): 4758.098 NYTME (km.): 566.879 Building: 1

Emission Point: 00107

Height (ft.): 25 Length (in.): 48 Width (in.): 48 NYTMN (km.): 4758.128 NYTME (km.): 566.876 Building: 1

Emission Point: 00110

Height (ft.): 30 Length (in.): 18 Width (in.): 18 NYTMN (km.): 4758.167 NYTME (km.): 566.853 Building: 1

Emission Point: 00114

Height (ft.): 25 Diameter (in.): 48

NYTMN (km.): 4758.149 NYTME (km.): 566.818 Building: 1

Emission Point: 00115

Height (ft.): 8 Diameter (in.): 4

NYTMN (km.): 4758.16 NYTME (km.): 566.825 Building: 1

Emission Point: 00116

Height (ft.): 12 Length (in.): 23 Width (in.): 18 NYTMN (km.): 4758.121 NYTME (km.): 566.841 Building: 1

Emission Point: 00117

Height (ft.): 14 Length (in.): 23 Width (in.): 18 NYTMN (km.): 4758.121 NYTME (km.): 566.841 Building: 1

Item 27.2(From Mod 5):

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

Emission Unit: A-00002

Emission Point: 00202

Height (ft.): 14 Diameter (in.): 13

NYTMN (km.): 4757.811 NYTME (km.): 566.935 Building: 2

Emission Point: 00205

Height (ft.): 14 Diameter (in.): 22

NYTMN (km.): 4757.814 NYTME (km.): 566.945 Building: 2

Emission Point: 00209

Height (ft.): 25 Length (in.): 44 Width (in.): 41 NYTMN (km.): 4758.1 NYTME (km.): 566.9 Building: 2

Emission Point: 0204A

Height (ft.): 18 Diameter (in.): 24

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NYTMN (km.): 4757.86 NYTME (km.): 566.93 Building: 2

Emission Point: 0204B

Height (ft.): 6 Diameter (in.): 18

NYTMN (km.): 4757.815 NYTME (km.): 566.939 Building: 2

Item 27.3(From Mod 4):

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

Emission Unit: A-00001

Emission Point: 00106

Height (ft.): 14 Diameter (in.): 22

NYTMN (km.): 4758.1 NYTME (km.): 566.9 Building: 1

Emission Point: 00113

Height (ft.): 30 Diameter (in.): 18

NYTMN (km.): 4758.166 NYTME (km.): 566.819 Building: 1

Emission Point: 0103A

Height (ft.): 20 Diameter (in.): 6

NYTMN (km.): 4758.102 NYTME (km.): 566.849 Building: 1

Emission Point: 0103B

Height (ft.): 20 Diameter (in.): 4

NYTMN (km.): 4758.109 NYTME (km.): 566.847 Building: 1

Emission Point: 0103C

Height (ft.): 14 Diameter (in.): 4

NYTMN (km.): 4758.109 NYTME (km.): 566.847 Building: 1

Emission Point: 0109A

Height (ft.): 25 Length (in.): 18 Width (in.): 18 NYTMN (km.): 4758.171 NYTME (km.): 566.865 Building: 1

Emission Point: 0109B

Height (ft.): 30 Length (in.): 18 Width (in.): 18 NYTMN (km.): 4758.184 NYTME (km.): 566.865 Building: 1

Emission Point: 0109C

Height (ft.): 30 Length (in.): 18 Width (in.): 18 NYTMN (km.): 4758.182 NYTME (km.): 566.858 Building: 1

Emission Point: 0109D

Height (ft.): 30 Diameter (in.): 18

NYTMN (km.): 4758.183 NYTME (km.): 566.854 Building: 1

Emission Point: 0112A

Height (ft.): 14 Diameter (in.): 4

NYTMN (km.): 4758.066 NYTME (km.): 566.874 Building: 1

Emission Point: 0112B



Height (ft.): 14 Diameter (in.): 4

NYTMN (km.): 4758.066 NYTME (km.): 566.872 Building: 1

Item 27.4(From Mod 4):

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

Emission Unit: A-00002

Emission Point: 0201B

Height (ft.): 8 Diameter (in.): 12

NYTMN (km.): 4757.814 NYTME (km.): 566.936 Building: 2

Emission Point: 0201C

Height (ft.): 18 Diameter (in.): 8

NYTMN (km.): 4757.814 NYTME (km.): 566.931 Building: 2

Emission Point: 0204C

Height (ft.): 20 Diameter (in.): 40

NYTMN (km.): 4757.848 NYTME (km.): 566.953 Building: 2

Emission Point: 0206A

Height (ft.): 15 Diameter (in.): 8

NYTMN (km.): 4757.783 NYTME (km.): 566.876 Building: 2

Emission Point: 0206B

Height (ft.): 15 Diameter (in.): 8

NYTMN (km.): 4757.783 NYTME (km.): 566.88 Building: 2

Emission Point: 0206C

Height (ft.): 12 Diameter (in.): 8

NYTMN (km.): 4757.783 NYTME (km.): 566.882 Building: 2

Emission Point: 0206D

Height (ft.): 20 Diameter (in.): 6

NYTMN (km.): 4757.784 NYTME (km.): 566.886 Building: 2

Emission Point: 0206E

Height (ft.): 18 Diameter (in.): 8

NYTMN (km.): 4757.784 NYTME (km.): 566.887 Building: 2

Emission Point: 0206F

Height (ft.): 18 Diameter (in.): 8

NYTMN (km.): 4757.784 NYTME (km.): 566.887 Building: 2

Emission Point: 0206G

Height (ft.): 18 Diameter (in.): 8

NYTMN (km.): 4757.784 NYTME (km.): 566.89 Building: 2

Emission Point: 0206H

Height (ft.): 18 Diameter (in.): 8

NYTMN (km.): 4757.785 NYTME (km.): 566.892 Building: 2



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Condition 28: Process Definition By Emission Unit Effective between the dates of 01/16/2019 and 01/15/2029

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 28.1(From Mod 5):

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

Emission Unit: A-00001

Process: 101 Source Classification Code: 3-08-007-99

Emission Source/Control: FI101 - Control Control Type: SINGLE CYCLONE

Emission Source/Control: BLUEO - Process

Emission Source/Control: LONGO - Process

Item 28.2(From Mod 5):

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

Emission Unit: A-00001

Process: 102 Source Classification Code: 3-08-007-99

Emission Source/Control: MANHO - Process

Item 28.3(From Mod 5):

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

Emission Unit: A-00001

Process: 106 Source Classification Code: 3-08-007-01

Process Description:

The machine shop dust collection system utilizes a cyclone type system with baghouses to control particulate emissions from various cutting, trimming, and sanding activities performed on polyester and epoxy resin reinforced with fiberglass and carbon fiber materials.

Emission Source/Control: F0106 - Control

Control Type: FABRIC FILTER

Emission Source/Control: MACHS - Process

Item 28.4(From Mod 5):

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

Emission Unit: A-00001

Process: 107 Source Classification Code: 3-08-007-01

Process Description:

Various cutting, grinding and sanding processes

controlled by a Torit baghouse (2024).



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Emission Source/Control: DUST2 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: DUSTC - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: CNCSW - Process

Item 28.5(From Mod 5):

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

Emission Unit: A-00001

Process: 110 Source Classification Code: 3-08-007-99

Emission Source/Control: GRINM - Control

Control Type: PAPER FILTER

Emission Source/Control: GRIND - Process

Item 28.6(From Mod 5):

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

Emission Unit: A-00001

Process: 114 Source Classification Code: 3-08-007-01

Emission Source/Control: FI114 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: HGHBY - Process

Item 28.7(From Mod 5):

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

Emission Unit: A-00001

Process: 115 Source Classification Code: 3-08-007-99

Emission Source/Control: FI115 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: BRZRM - Process

Item 28.8(From Mod 5):

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

Emission Unit: A-00002

Process: 202 Source Classification Code: 3-08-007-99

Process Description:

IGC winder performing filament winding of epoxy resin

reinforced with fiberglass

Emission Source/Control: FI202 - Control

Control Type: FABRIC FILTER



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Emission Source/Control: IGCWD - Process

Item 28.9(From Mod 5):

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

Emission Unit: A-00002

Process: 204 Source Classification Code: 3-08-007-22

Emission Source/Control: FF001 - Control

Control Type: FABRIC FILTER

Emission Source/Control: FF002 - Control

Control Type: FABRIC FILTER

Emission Source/Control: BOOT1 - Process

Emission Source/Control: BOOT2 - Process

Emission Source/Control: BOOT3 - Process

Item 28.10(From Mod 5):

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

Emission Unit: A-00002

Process: 205 Source Classification Code: 3-08-007-01

Process Description:

The machine shop dust collection system utilizes a cyclone type system to control particulate emissions from this portion of the facility where various activities are performed.

Emission Source/Control: FI205 - Control

Control Type: FABRIC FILTER

Emission Source/Control: MACS2 - Process

Item 28.11(From Mod 5):

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

Emission Unit: A-00002

Process: 207 Source Classification Code: 3-08-007-01

Process Description:

The oil and gas area dust collection system utilizes a cyclone type system to control particulate emissions from this portion of the facility where various activities are

performed.

Emission Source/Control: F207A - Control

Control Type: FABRIC FILTER

Emission Source/Control: OGOPS - Process

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Item 28.12(From Mod 4):

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

Emission Unit: A-00001

Process: 103 Source Classification Code: 3-08-007-99

Process Description:

Post curing ovens on 90%+ cured fiberglass reinforced

epoxy resin material.

Emission Source/Control: BLUOV - Process

Emission Source/Control: STABX - Process

Emission Source/Control: WISCO - Process

Item 28.13(From Mod 4):

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

Emission Unit: A-00001

Process: 104 Source Classification Code: 3-08-007-36

Process Description:

Wet lay-up of polyester resin reinforced with plastic.

Emission Source/Control: MOLDR - Process

Emission Source/Control: MOLDS - Process

Item 28.14(From Mod 4):

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

Emission Unit: A-00001

Process: 105 Source Classification Code: 3-08-007-23

Process Description:

Filament winding of polyester resin reinforced with

fiberglass

Emission Source/Control: RINGW - Process

Item 28.15(From Mod 4):

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

Emission Unit: A-00001

Process: 108 Source Classification Code: 3-08-007-01

Process Description:

Ring grinding is performed on polyester resin reinforced

with fiberglass products.

Emission Source/Control: VENT1 - Control

Control Type: PAPER FILTER

Emission Source/Control: RINGG - Process

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Item 28.16(From Mod 4):

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

Emission Unit: A-00001

Process: 109 Source Classification Code: 3-08-007-99

Process Description:

Four ovens to cure epoxy fiberglass reinforced tubes

Emission Source/Control: OVEN4 - Combustion

Emission Source/Control: HOVEN - Process

Emission Source/Control: VOVN1 - Process

Emission Source/Control: VOVN2 - Process

Item 28.17(From Mod 4):

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

Emission Unit: A-00001

Process: 111 Source Classification Code: 3-08-007-36

Process Description:

Vacuum infusion process involving polyester fiberglass

reinforced resin

Emission Source/Control: OVENB - Process

Emission Source/Control: OVENP - Process

Emission Source/Control: VACIN - Process

Item 28.18(From Mod 4):

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

Emission Unit: A-00001

Process: 112 Source Classification Code: 3-08-007-99 Process Description: Ovens cure and post-cure epoxy prepreg materials

Emission Source/Control: COLBO - Process

Emission Source/Control: COLTO - Process

Item 28.19(From Mod 4):

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

Emission Unit: A-00001

Process: 113 Source Classification Code: 3-08-007-99

Process Description:

Curing oven for larger filament wound cones and rings

made with epoxy resin



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Emission Source/Control: JENSN - Process

Item 28.20(From Mod 4):

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

Emission Unit: A-00002

Process: 201 Source Classification Code: 3-08-007-36

Process Description:

Wet lay-up of polyester resin reinforced with plastic

Emission Source/Control: F201A - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: F201B - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: OVN09 - Process

Emission Source/Control: OVN10 - Process

Emission Source/Control: WETLU - Process

Emission Source/Control: WLOV1 - Process

Item 28.21(From Mod 4):

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

Emission Unit: A-00002

Process: 203 Source Classification Code: 3-08-007-36

Process Description:

Wet lay-up of polyester resin reinforced with plastic

within the transportation area

Emission Source/Control: WETLU - Process

Item 28.22(From Mod 4):

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

Emission Unit: A-00002

Process: 206 Source Classification Code: 3-08-007-23

Process Description:

Filament winding of epoxy resin reinforced with

fiberglass. Eight natural gas fired ovens are also present

within this area.

Emission Source/Control: OGOV1 - Process

Emission Source/Control: OGOV2 - Process

Emission Source/Control: OGOV3 - Process

Emission Source/Control: OGOV4 - Process

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Emission Source/Control: OGOV5 - Process

Emission Source/Control: OGOV6 - Process

Emission Source/Control: OGOV7 - Process

Emission Source/Control: OGOV8 - Process

Item 28.23(From Mod 4):

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

Emission Unit: A-00002

Process: 208 Source Classification Code: 3-07-030-99

Process Description:

Woodworking area where facility personnel make pallets, crates, and temporary wood tooling using equipment including a table saw, router, and hand assembly for parts shipment. A cyclone dust collector is present within the area to control particulate emissions.

Emission Source/Control: FI208 - Control Control Type: SINGLE CYCLONE

Emission Source/Control: WDWRK - Process



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