

Facility DEC ID: 5094200510

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 5-0942-00510/00004
Effective Date:

Expiration Date:

Permit Issued To: UMR BOARDS PRODUCTION LLC
26 Werner Schluter Way
Plattsburgh, NY 12901

Contact: Terry Beyer
194 Pleasant Ridge Rd
Plattsburgh, NY 12901
(888) 472-4588

Facility: Plattsburgh Facilities - UMR Board Production LLC and Schluter Systems LP
3 and 26 Werner Schluter Way
Plattsburgh, NY 12901

Description:

UMR Boards Production LLC (UMR) is seeking a NYSDEC Title V Air Facility permit for the combined facilities operated by UMR, Schluter Systems LP (SSLP (KB3)) and KB4 located on Tax parcels 232.-3-10.1, 232.-3-10.2, and 232.-3-18, In the town of Plattsburgh, Clifton county, NY (The "Schluter Systems & UMR Boards Facility" or "Facility").

UMR, SSLP and KB4 manufacture materials used for building and waterproofing tiled shower and tub installations. The principal products include molded expanded polystyrene shower (EPS) floors (shower trays) and laminated extruded polystyrene (XPS) foam core material (Kerdi-Board) for shower and tub surrounding walls and shaped parts such as benches, niches and curbs. The kerdi-board laminating line includes a flexographic printing unit to print product information on the board stock. The molding operation is operated by UMR and the kerdi-board operation is operated by Schluter. The facility installed a regenerative thermal oxidizer (RTO) to reduce emissions of volatile organic compounds (VOC) associated with the EPS and XPS foaming processes. The facility must maintain a continuous 99% destruction efficiency of VOC in the Regenerative Thermal Oxidizer (RTO) in order to comply with 6NYCRR Part 212-2.3(b).

The facility shall demonstrate compliance with the potential to emit (PTE) of total VOC below 132 tons per year emissions and actual emission of Methylene diphenyl diisocyanate (MDI) below 10 pounds per year.

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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: ERIN M DONHAUSER
NYSDEC - REGION 5
232 GOLF COURSE RD
WARRENSBURG, NY 12885-1172

Authorized Signature: _____ Date: ____ / ____ / ____

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Notification of Other State Permittee Obligations**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

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DEC GENERAL CONDITIONS****** General Provisions ******

**For the purpose of your Title V permit, the following section contains
state-only enforceable terms and conditions.**

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3

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

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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.

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Condition 5: Submission of application for permit modification or renewal-REGION 5

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 5 Headquarters
 Division of Environmental Permits
 Route 86, PO Box 296
 Ray Brook, NY 12977-0296
 (518) 897-1234

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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: UMR BOARDS PRODUCTION LLC

26 Werner Schluter Way

Plattsburgh, NY 12901

Facility: Plattsburgh Facilities - UMR Board Production LLC and Schluter Systems LP

3 and 26 Werner Schluter Way

Plattsburgh, NY 12901

Authorized Activity By Standard Industrial Classification Code:

3086 - PLASTICS FOAM PRODUCTS

3089 - PLASTICS PRODUCTS, NEC

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NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (a) (4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and

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reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: Property Rights - 6 NYCRR 201-6.4 (a) (6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: Severability - 6 NYCRR 201-6.4 (a) (9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

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

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V

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facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the department pursuant to the provisions of section 201- 6.6 of this Subpart.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit

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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

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

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.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

**Condition 1: Acceptable Ambient Air Quality
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 200.6****Item 1.1:**

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

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contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 3: Recordkeeping and Reporting of Compliance Monitoring
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-6.4 (c)

Item 3.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii)The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

Condition 4: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-6.4 (c)

Item 4.1:

The Compliance Certification activity will be performed for the Facility.

Item 4.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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The facility shall keep monthly natural gas and diesel fuel usage records and submit an annual fuel usage report.

Records and supporting information shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 5: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (2)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of a Title V facility must keep all records used to determine compliance with any applicable limit(s) and/or monitoring requirement(s) at the facility (or other Department approved location) for a minimum of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 6: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

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Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal

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business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere

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in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 7: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters.

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The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Air Compliance Branch
USEPA Region 2 DECA/ACB
290 Broadway, 21st Floor
New York, NY 10007

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
Region 5 Suboffice
232 Golf Course Road
Warrensburg, NY 12885-1172

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2026.
Subsequent reports are due on the same day each year

Condition 8: Recordkeeping requirements
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 202-2.5

Item 8.1:

- (a) The following records shall be maintained for at least five years:
- (1) a copy of each emission statement submitted to the department; and

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(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires - Prohibitions
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 215.2

Item 9.1:

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

Item 9.2

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

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may

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be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

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

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

**Condition 10: Maintenance of Equipment
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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 11: Recycling and Salvage
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

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

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to
the air
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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.

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Condition 13: Exempt Sources - Proof of Eligibility
Effective for entire length of Permit

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

Item 13.1:

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

Condition 14: Trivial Sources - Proof of Eligibility
Effective for entire length of Permit

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

Item 14.1:

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

Condition 15: Requirement to Provide Information
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4 (a) (4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: Right to Inspect
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4 (a) (8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

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(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Required Emissions Tests
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 202-1.1

Item 17.1:

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

Condition 18: Accidental release provisions.
Effective for entire length of Permit

Applicable Federal Requirement: 40 CFR Part 68

Item 18.1:

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

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

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

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

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**Condition 19: Recycling and Emissions Reduction
Effective for entire length of Permit**

Applicable Federal Requirement: 40 CFR 82, Subpart F

Item 19.1:

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

The following conditions are subject to annual compliance certification requirements for Title V permits only.

**Condition 20: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 200.6

Item 20.1:

The Compliance Certification activity will be performed for the Facility.

Item 20.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The emission rate of trans-1,3,3,3-Tetrafluoropropene (CAS# 29118-24-9) must not exceed the accepted compliant air dispersion modeling demonstration calculated quantity. If actual emissions rate exceeds the modeled emission rate at any time during operation, the facility must report the increase and detail as to why this occurred within 30-days to the department. Based on the increase of the trans-1,3,3,3-Tetrafluoropropene's emission rate, the facility may be required to update air dispersion modeling and modify Air Title V permit.

The facility owner or operator shall submit an annual report of the 12-month of actual usage of the trans-1,3,3,3-Tetrafluoropropene compound used as blowing agents at the facility's extruder operations at KB4 unit to the department.

Records shall be maintained at the facility for a minimum of five (5) years and must be available to the Department upon request.

Parameter Monitored: TRANS-1,3,3,3-TETRAFLUOROPROPENE

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Upper Permit Limit: 198.42 pounds per hour

Monitoring Frequency: WHEN THE SOURCE IS OPERATING

Averaging Method: AVERAGING METHOD - SEE MONITORING

DESCRIPTION

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 30 days after first annual (12 month) period following Permit

Issue Date

Condition 21: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 200.6

Item 21.1:

The Compliance Certification activity will be performed for the Facility.

Item 21.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The emission rate of 1-Chloro-3,3,3-trifluoropropene (CAS # 102687-65-0) must not exceed the accepted compliant air dispersion modeling demonstration calculated quantity. If actual emissions rate exceeds the modeled emission rate at any time during operation, the facility must report the increase and detail as to why this occurred within 30-days to the department. Based on the increase of the 1-Chloro-3,3,3-trifluoropropene's emission rate, the facility may be required to update air dispersion modeling and modify Air Title V permit.

The facility owner or operator shall submit an annual report of the 12-month of actual usage of the 1-Chloro-3,3,3-trifluoropropene compound used as blowing agents at the facility's extruder operations at KB4 unit to the department.

Records shall be maintained at the facility for a minimum of five (5) years and must be available to the Department upon request.

Parameter Monitored: 1-CHLORO-3,3,3-TRIFLUOROPROP-1-ENE

Upper Permit Limit: 198.42 pounds per hour

Monitoring Frequency: WHEN THE SOURCE IS OPERATING

Averaging Method: AVERAGING METHOD - SEE MONITORING

DESCRIPTION

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 30 days after first annual (12 month) period following Permit

Issue Date

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Condition 22: Emission Unit Definition
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 22.1:

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

Emission Unit: 1-00UMR

Emission Unit Description:

UMR uses an expanded polystyrene (EPS) process to form shower trays used in new construction and renovation of bathrooms. The EPS process uses polystyrene beads in the manufacturing process which contain Pentane and ISO-Pentane as the "blowing agent". When exposed to heat the blowing agent expands the beads. Additional heat causes the expanded beads to fuse together to form a closed-cell rigid foam material. UMR has been operating seven (7) molding press previously. UMR will install an eighth (8) molding press with this Title V permit. UMR includes processes such as Silo storage (Beads silo (shall be connected to the RTO)), Eight (8) molding press forming (shall be connected to RTO), pre expander includes pre-expander room, main vessel & fluidized bed pre-expander (shall be connected to the RTO), UMR finished goods inventory includes warehouse, molding press purge and seven (7) dryers. Thermal Oxidizer (DURR RTO) (1,672,000 Btu/hr burner) shall be connected to 1-00UMR and 2-0SSLP to control VOC emissions. The processes PXP, MLD and SIS, under the 1-00UMR unit, are connected to RT001 (RT002). Source/control RT001 (DURR RTO) and RT002 (DURR RTO) are one source/control at the facility. Added as separate emission source/control just for the permitting process.

Building(s): RAND
Thinset
UMR
WHSE

Item 22.2:

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

Emission Unit: 2-0SSLP

Emission Unit Description:

SSLP (KB3) operates a laminating line to apply face sheets to a foam core to produce a product called Kerdi-Board. The face sheets are applied with hot melt polyurethane moisture cure adhesive (Hot melt glue). The foam core is an extruded polystyrene (XPS) web that is delivered to the facility in bulk rolls. The rolls are

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stored in the SSLP facility prior to use in order to age the material to obtain optimal properties for further processing. The foam core is expanded in a hot thermofix press prior to application of the face sheets. A 0.8 MMBTU hot oil heater provides the heat for the thermofix press. SSLP (KB3) includes processes such as Roll storage (connected to the RTO), process laminating, cutting & parts assembly, and SSLP finished goods inventory. The laminating process includes adhesive application, printing, becker saw and erbo dust collector. The adhesive application line includes the addition of the nuisance odor control hood. The cutting & parts assembly process includes panel saw & milling machines, and manual/automated glue stations. Thermal Oxidizer (DURR RTO) shall be connected to 1-00UMR and 2-0SSLP to control VOC emissions. The process RLS under the 2-0SSLP unit shall be connected to RT002 (RT001). Source/control RT001 (DURR RTO) and RT002 (DURR RTO) are one source/control at the facility. Added as separate emission source/control just for the permitting process.

Building(s): SSLP
WHSE

Item 22.3:

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

Emission Unit: 3-COMBU

Emission Unit Description:

Combustion unit consisting of one (1) 10,400,000 BTU/hr boiler (Cleaver Brooks) to produce steam in the UMR molding process, and one (1) 1,672,000 BTU/hr burner in the regenerative thermal oxidizer (RTO) VOC control device. It also includes one hot oil heater (exempt) for the SSLP thermofix process, thirteen (13) utility and backup boilers (exempt), thirteen (13) backup generator and fire pump engines (exempt), and natural gas powered space heaters (exempt).

Building(s): UMR

Item 22.4:

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

Emission Unit: 4-00KB4

Emission Unit Description:

KB4 uses an extruded polystyrene (XPS) process to form Kerdi-Board used in new construction and renovation of bathrooms. The XPS process uses solid polystyrene resin pellets in the manufacturing process. The resin is liquefied in an extruding machine. Blowing agents (Carbon Dioxide, Dimethyl ether and hydrofluoroolefin) are injected into the liquid resin in the extruder. The

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blowing agents expand the resin into a closed cell rigid foam material which is extruded as raw board stock. The KB4 includes processes such as extrusion, laminating, preliminary sizing and regranulation, cutting & parts assembly, and KB4 finished goods inventory. The laminating process includes sources such as adhesive application (contains 4,4-methylene diphenyl diisocyanate (MDI)) to bond the face sheets to the foam core which is connected to the adhesive odor control, printing, becker saw and erbo dust control. preliminary sizing and regranulation include cut, trim, plan machines and agglomerator. The cutting and sizing area includes some bag house to control particulates. The cutting and parts assembly include panel saw and milling machines, manual/ automated glue stations.

Building(s): KB4

Condition 23: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4

Item 23.1:

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

Emission Unit: 4-00KB4

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

Item 23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The Extruded Polystyrene (XPS) resin throughput by weight from the KB4 unit at this facility shall be limited to no more than 9656 tons during any consecutive 12-month period, rolled monthly. The facility must monitor the throughput from the KB4 unit and maintain the monthly and 12-month rolling throughput records. Each 12-month XPS resin throughput total for the KB4 unit must be below the permitted limit of 9656 tons.

Based upon emission calculations performed for XPS resin

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throughput limit, total Volatile Organic Compounds (VOCs) emissions from KB4 shall be below 19.31 per year (The emission unit PTE from combustion sources and from XPS resin 21.1 tons per year) by maintaining XPS resin throughput below this limit.

The facility must submit an annual report of monthly and 12 month rolling throughput to document compliance with the permitted limit of 9656 tons per year of XPS resin.

Records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: RAW MATERIAL

Upper Permit Limit: 9656 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 24: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4

Item 24.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 2-0SSLP

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The Extruded Polystyrene (XPS) foam throughput by weight from the SSLP (KB3) unit at this facility shall be limited to no more than 4235 tons during any consecutive 12-month period, rolled monthly. The facility must monitor the throughput from the SSLP unit and maintain the monthly and 12-month rolling throughput records. Each 12-month XPS

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foam throughput total for the SSLP (KB3) unit must be below the permitted limit of 4235 tons.

Based upon emission calculations performed for XPS foam throughput limit, total Volatile Organic Compounds (VOCs) emissions from SSLP (KB3) shall be below 46.7 tons per year by maintaining XPS foam throughput below this limit.

The facility must submit an annual report of monthly and 12 month rolling throughput to document compliance with the permitted limit of 4235 tons per year of XPS foam.

Records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: RAW MATERIAL

Upper Permit Limit: 4235 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 25: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4

Item 25.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-00UMR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The Expanded Polystyrene Beads (EPS beads) throughput by

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weight from the UMR unit at this facility shall be limited to no more than 5937 tons during any consecutive 12-month period, rolled monthly. The facility must monitor the throughput from the UMR unit and maintain the monthly and 12-month rolling throughput records. Each 12-month EPS bead throughput total for the UMR unit must be below the permitted limit of 5937 tons.

Based upon emission calculations performed for EPS bead throughput limit, total Volatile Organic Compounds (VOCs) emissions from UMR shall be below 63.1 tons per year (The emission unit PTE from combustion sources and from XPS resin 64.2 tons per year) by maintaining EPS bead throughput below this limit.

The facility must submit an annual report of monthly and 12 month rolling throughput to document compliance with the permitted limit of 5937 tons per year of EPS bead.

Records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: RAW MATERIAL

Upper Permit Limit: 5937 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 26: Progress Reports Due Semiannually
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 201-6.4 (d) (4)

Item 26.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met,

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and any preventive or corrective measures adopted.

Condition 27: Operational Flexibility
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4 (f)

Item 27.1:

A permit modification is not required for changes that are provided for in the permit. Such changes include approved alternate operating scenarios and changes that have been submitted and approved pursuant to an established operational flexibility protocol and the requirements of this section. Each such change cannot be a modification under any provision of Title I of the Clean Air Act or exceed, or cause the facility to exceed, an emissions cap or limitation in the permit. The facility owner or operator must incorporate all changes into any compliance certifications, record keeping, and/or reporting required by the permit.

Condition 28: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4 (f) (2)

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operational Flexibility Protocol

I. Protocol Objective

The objective of this condition is to enable operational flexibility at the facility by building the capability to make certain changes pursuant to this protocol into the Title V permit. As provided under 6 NYCRR Part 201-6.4(f), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.6 unless required by the Department pursuant to 201-6.4(f)(4).

II. Protocol

A. Criteria

1. Changes reviewed under this protocol shall be evaluated in accordance with the following criteria:

a. All underlying federal and state requirements with

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which the new or changed operation or emission source must comply must exist in the Title V permit. Existing permit conditions may be amended to reference or include the new or changed operation or emission source and any related information, and/or subject to the Department's approval, new conditions proposed, to provide the appropriate monitoring parameters.

b. Any new or changed emission source shall not be part of a source project that results in a significant net emission increase that exceeds the New Source Review (NSR) thresholds identified in 6 NYCRR Part 231.

c. The facility shall not use the protocol to make physical changes or changes in the method of operation of existing emissions sources that would require a new or modified federally enforceable emissions cap. Such changes must be addressed via the significant permit modification provisions.

B. Notification Requirements for Changes Reviewed under the Protocol

1. The facility shall notify the Department in writing of the proposed change at least 15 days in advance of making the proposed change.

2. Notifications made in accordance with this protocol must include the following information:

a. Identification of the Title V permit emission unit, process(es), emission source(s) and emission point(s) affected by the proposed change with applicable revisions to the Emission Unit structure;

b. Description of the proposed change, including operating parameters affected;

c. Identification and description of emissions control device or technology that will be used; and

d. Documentation of the project's, or emission source's, compliance with respect to all state and/or federally applicable requirements, including the following:

i. Calculations demonstrating the emission rate potential and maximum projected annual actual emission rates for all contaminants affected by the change;

ii. Documentation demonstrating that the change is not subject to the New Source Review requirements described in

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6 NYCRR Part 231;

iii. Identification and evaluation of all state and federal regulations applicable to the proposed change;

iv. A description of any additional operating and record keeping procedures necessary to ensure compliance with all applicable requirements; and

v. Any other relevant information used for the evaluation of the proposed change under this protocol.

e. Any other relevant information used for the evaluation of the proposed project or emission source under the Protocol.

C. Review and Approval of Changes

1. The Department shall respond to the permittee in writing with a determination within 15 days of receipt of the notification required by Section II.B of this protocol.

2. The Department may require a permit modification in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to the notification do not meet the criteria under Section II. A above or that the changes may have a significant air quality impact or be otherwise potentially significant under SEQRA (6 NYCRR Part 617).

3. The Department may require that the permittee not undertake the proposed change until it completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.

D. Additional Compliance Obligations for Changes Made Under this Protocol

1. Upon commencement of the change, the facility shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with II.A.1.a above.

2. The facility shall provide with the semiannual monitoring report, a summary of the changes made in

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accordance with this protocol and a statement of the compliance status of each. Changes reported should include all those made during the corresponding period and any earlier changes that have not yet been incorporated into the permit.

3. The facility shall include each change made pursuant to this protocol in the next application for permit modification or renewal, whichever is first. Changes made pursuant to this protocol are not subject to the permit shield provisions described in 6 NYCRR 201-6.4(g) until they are incorporated into the Title V permit.

4. The facility shall maintain a record of each change made pursuant to this protocol at the facility and shall make such records available to the Department upon request.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 29: Statement dates for emissions statements.
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 202-2.4 (a) (3)

Item 29.1:

This facility is required to submit an annual emission statement electronically and these emissions statements must be submitted to the department as per the following schedule:

- (i) March 15th of each year for facilities with three or fewer processes listed in their Title V permit:
- (ii) March 31st of each year for facilities with four to six processes listed in their Title V permit:
- (iii) April 15th of each year for facilities with 7 to 12 processes listed in their Title V permit:
- (iv) April 30th of each year for facilities with 13 or more processes listed in their Title V permit.

**Condition 30: Visible Emissions Limited
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 211.2

Item 30.1:

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

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opacity.

**Condition 31: Maintain all process emission sources, including the associated air pollution control and monitoring equipment
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 212-1.5 (g)**Item 31.1:**

At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safety, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

**Condition 32: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 212-1.6 (a)**Item 32.1:**

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

Emission Unit: 1-00UMR	Emission Point: 00011
Emission Unit: 1-00UMR	Emission Point: 00012
Emission Unit: 1-00UMR	Emission Point: 00071
Emission Unit: 2-0SSLP	Emission Point: 00061
Emission Unit: 2-0SSLP	Emission Point: 00062
Emission Unit: 2-0SSLP	Emission Point: 00063
Emission Unit: 4-00KB4	Emission Point: 00081
Emission Unit: 4-00KB4	Emission Point: 00086
Emission Unit: 4-00KB4	Emission Point: 00088

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall conduct a visible emissions observation of all emission points and emission sources specified by this condition once per day while the process is in operation.

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1) Observe the stack for each emission source which is operating, once per day for visible emissions. This observation(s) must be conducted during daylight hours, but not during periods of adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of observation
- observer's name
- identity of the emission point
- weather conditions
- was a plume observed

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

3) If the operator observes any visible emissions (other than steam - see below) for two consecutive days, either a Method 9 or Method 22 analysis (based upon the source emitting the visible emissions) of the affected emission point(s) or emission source(s) must be conducted within two (2) business days of such occurrence. The results of either the Method 9 or Method 22 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing either the Method 9 or Method 22 analysis if the opacity standard has been contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

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

The facility owner or operator shall make any necessary corrections and verify that the excess visible emissions problem has been corrected.

Reference Test Method: See Monitoring Description

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Monitoring Frequency: DAILY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

**Condition 33: Emission Testing Using Approved Procedures
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 212-1.7 (a)

Item 33.1:

a) Facility owners and/or operators of a process emission source required by the department to demonstrate compliance with this Part may be required to conduct capture efficiency and/or stack emissions testing using acceptable and approved procedures pursuant to Part 202 of this Title.

**Condition 34: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 212-1.7 (a)

Item 34.1:

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

Emission Unit: 4-00KB4

Regulated Contaminant(s):
CAS No: 000101-68-8 METHYLENE BISPHENYL ISOCYANATE

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility shall conduct a performance test to demonstrate compliance status with the Methylene Bisphenyl Isocyanate (MDI) emission rate limit in accordance with the permit. This performance test must be conducted under worst case operating conditions. Additional testing will be conducted at the discretion of the Department.

The facility must submit a stack test protocol to the Department for approval at least 90 days prior to the testing. The facility must perform stack test based on an approved stack test protocol, and then submit the stack test report for approval, within 60 days of performing the test to the Department.

The facility shall maintain all required records on-site for a period of five years and make them available to

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representatives of the Department upon request.

Upper Permit Limit: 12.0 micrograms per cubic meter

Reference Test Method: Methods Acceptable to the Department

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 35: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212-1.7 (b) (1)

Item 35.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-00UMR

Process: MLD

Emission Source: RT001

Emission Unit: 1-00UMR

Process: PXP

Emission Source: RT001

Emission Unit: 1-00UMR

Process: SIS

Emission Source: RT001

Emission Unit: 2-0SSLP

Process: RLS

Emission Source: RT002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 35.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The Regenerative thermal oxidizer (RTO) shall be operated when the associated process equipment is operating. The combustion temperature of RTO must be maintained at a manufacturer's recommended minimum temperature of 1500 degrees Fahrenheit to comply with 6 NYCRR Part 212-2.3(b). Or the combustion chamber temperature of the RTO must be at least as high as the temperature that existed during the last successful stack test. The temperature of the oxidizer was 1500 degrees Fahrenheit with a residence time of 0.75 seconds during RTO stack test in 2025.

The combustion temperature shall be monitored and recorded on a continuous basis when the RTO is operating, except

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during quality assurance and routine maintenance activities. If the one hour average temperature falls below the specified limit in this condition, it shall be recorded and included in the facility's annual report. If any deviation associated with malfunction or breakdown of the thermal oxidizer occurs for a period of four hours or more which results in excessive emissions, the occurrence must be submitted to NYS DEC in writing within seven (7) days.

All equipment shall be installed and maintained in accordance with the manufacturer's instructions and specifications. The temperature monitoring device will be calibrated in accordance with the manufacturer's specifications. The RTO system shall be inspected annually.

All monitoring, operating, and maintenance records shall be kept at the facility for a minimum of five (5) years and must be 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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 36: Compliance Certification
Effective for entire length of Permit

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

Item 36.1:

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

Emission Unit: 1-00UMR	
Process: MLD	Emission Source: RT001
Emission Unit: 1-00UMR	
Process: PXP	Emission Source: RT001
Emission Unit: 1-00UMR	
Process: SIS	Emission Source: RT001
Emission Unit: 2-0SSLP	
Process: RLS	Emission Source: RT002

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

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility must maintain a continuous 99% destruction efficiency of VOC in the Regenerative Thermal Oxidizer (RTO) in order to comply with 6NYCRR Part 212-2.3(b).

Within 60 days after achieving the maximum production rate at which processes shall be operated, but not later than 180 days after the processes start up, the facility must conduct a performance test to determine the VOC destruction efficiency for the RTO.

The performance test shall be conducted while operating the process at maximum throughput rate and under normal process control conditions. The process operation during the testing shall represent the conditions that result in highest known concentrations of the target contaminant. During the performance test, process and control operating parameters, Beads and XPS foam throughput, and other pertinent information shall be recorded. The combustion temperature of the RTO shall be continuously recorded throughout the performance test in accordance with this permit.

Emission testing, sampling and analytical determinations shall be conducted in accordance with test methods acceptable to the Department. The facility must submit a stack test protocol to the Department for approval at least 30 days prior to the test. The protocol should include specifics on the material usage and process operation. Stack test report must be submitted to the Department within 60 days after the completion of the test. Additional testing may be required at the Department's discretion.

Lower Permit Limit: 99 percent

Reference Test Method: EPA Method 25A

Monitoring Frequency: Once every five years

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 37: Compliance Certification
Effective for entire length of Permit

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

Item 37.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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

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

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: Once every five years

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 38: Compliance Certification
Effective for entire length of Permit

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

Item 38.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 38.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility shall maintain differential pressure for all dust collectors according to manufacturer's specification.

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Differential pressure shall be checked and recorded weekly. Air blast function shall be inspected and recorded weekly. Ductwork shall be inspected and recorded monthly. The dust collectors filter shall be serviced according to the manufacturer's recommendation.

For Thinset

Filters shall be serviced when differential pressure reaches 9 in H₂O.

Records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: 9 inches of water

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 39: Compliance Certification
Effective for entire length of Permit

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

Item 39.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 39.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility shall maintain differential pressure for all dust collectors according to manufacturer's specification. Differential pressure shall be checked and recorded weekly. Air blast function shall be inspected and recorded weekly. Ductwork shall be inspected and recorded monthly. The dust collectors filter shall be serviced according to the manufacturer's recommendation.

For SSLP/KB3 ERBO dust collector

Filters shall be serviced when differential pressure reaches 22 mbar.

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Records shall be kept at the facility for a minimum of five (5) years and must be available to the Department upon request.

Parameter Monitored: PRESSURE CHANGE

Upper Permit Limit: 22 millibar

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTIONAveraging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 40: RACT applicability for facilities located outside Lower Orange Co and NYC Metro area
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212-3.1 (a) (2)

Item 40.1:

Owners and/or operators of facilities located outside of the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury and New York City metropolitan area with an annual potential to emit of 100 tons or more of NO_x or 50 tons or more of VOCs must comply with the requirements of this section.

Condition 41: Required Compliance Plans for applicable 212-3 emission sources
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (1)

Item 41.1:

The compliance plan must identify RACT for each emission point that emits NO_x for major NO_x facilities or VOC for major VOC facilities. The compliance plan must identify the emission points that do not employ RACT, and a schedule for implementation of RACT must be included in the plan. A RACT analysis is not required for emission points with NO_x and VOC emission rate potentials less than 3.0 pounds per hour and actual emissions in the absence of control equipment less than 15.0 pounds per day at facilities located in the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury and New York City metropolitan area.

A RACT analysis is not required for emission points with NO_x and VOC emission rate potentials less than 3.0 pounds per hour at facilities located outside of the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury and New York City metropolitan area. RACT as approved by the department must be implemented on each emission point subject to this section by May 31, 1995.

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**Condition 42: Capture and Control Requirements
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (4) (i)

Item 42.1:

VOC emission points that are equipped with a capture system and a control device with an overall removal efficiency of at least 81 percent are equipped with reasonably available control technology.

Based on Section 212-1.1(b) Applicability.

Any emission limitation or other requirements in effect prior to the effective date of this Part shall remain in effect until issuance of a modified permit or registration or renewal of the permit or registration.

**Condition 43: "Once in always in" provision
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 212-3.1 (e)

Item 43.1:

Any facility that is subject to 6 NYCRR 212-3.1 requirements after May 31, 1995 will remain subject to these provisions even if the annual potential to emit NO_x or VOCs later fall below the applicability threshold.

**Condition 44: Compliance Certification
Effective for entire length of Permit**

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

Item 44.1:

The Compliance Certification activity will be performed for the Facility.

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

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

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a minimum of five years.

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

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DIESEL OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.0015 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 45: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)

Item 45.1:

The Compliance Certification activity will be performed for the Facility.

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any owner or operator of a stationary combustion installation (excluding combustion turbines) or a group of stationary combustion installations firing oil or oil in combination with other liquid or gaseous fuels with a total maximum heat input capacity of at least 50 million Btus per hour is required to meet the 0.1 lbs/mmBtu particulate matter standard. Compliance with this standard will be met by keeping vendor certified fuel receipts which contain the sulfur content of the oil being fired as required in Subpart 225-1 of this Title.

Monitoring Frequency: PER DELIVERY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 46: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.48c(a), NSPS Subpart Dc

Item 46.1:

The Compliance Certification activity will be performed for the Facility.

Item 46.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner and operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 47: Alternative recordkeeping
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60.48c(g)(2), NSPS Subpart Dc

Item 47.1:

As an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

Condition 48: Applicability
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60, NSPS Subpart IIII

Item 48.1:

Facilities that have stationary compression ignition internal combustion engines must comply with applicable portions of 40 CFR 60 Subpart IIII.

Condition 49: Applicability
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 60, NSPS Subpart JJJJ

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Item 49.1:

Facilities that have stationary spark ignition internal combustion engines must comply with applicable portions of 40 CFR 60 Subpart JJJJ.

Condition 50: Compliance Certification
Effective for entire length of Permit**Applicable Federal Requirement: 40 CFR 63.6640(f), Subpart ZZZZ****Item 50.1:**

The Compliance Certification activity will be performed for the Facility.

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emergency stationary RICE must operate the emergency stationary RICE according to the requirements in 40 CFR 63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 63.6640(f)(1) through (4), is prohibited. If the owner or operator does not operate the engine according to the requirements in 40 CFR 63.6640(f)(1) through (4), the engine will not be considered an emergency engine under subpart ZZZZ and must meet all requirements for non-emergency engines.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 51: Compliance Certification
Effective for entire length of Permit**Applicable Federal Requirement: 40 CFR Part 64****Item 51.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is required to continuously monitor the temperature of the Regenerative Thermal Oxidizer (RTO) as

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per a condition, in this permit, cited under 6 NYCRR 212-1.7. In addition to monitoring of the temperature of the RTO, the following will be used to meet the requirements of CAM:

The owner or operator will perform quarterly maintenance shall include inspection and any necessary repair or replacement of control burners, temperature sensors and other elements that could affect oxidizer performance.

Daily visual checks of the flame and burner while the RTO is operating and perform annual inspections of the burner assemblies, blowers, fans, dampers, refractory lining, oxidizer shell, fuel lines, and ductwork.

All equipment shall be installed and maintained in accordance with the manufacturer's instructions and specifications.

The compliance Assurance Monitoring plan shall be reviewed annually and updated or revised as necessary to reflect changes to the facility equipment inventory or operating practices to ensure continuing compliance with applicable regulations.

Monitoring Frequency: QUARTERLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

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

Condition 52: Emission Point Definition By Emission Unit
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 52.1:

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

Emission Unit: 1-00UMR

Emission Point: 00011

Height (ft.): 31

Diameter (in.): 12

NYTMN (km.): 4946.578 NYTME (km.): 619.608 Building: UMR

Emission Point: 00012

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Height (ft.): 31	Diameter (in.): 12	
NYTMN (km.): 4946.584	NYTME (km.): 619.647	Building: UMR
Emission Point: 00013		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.605	NYTME (km.): 619.641	Building: UMR
Emission Point: 00014		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.606	NYTME (km.): 619.638	Building: UMR
Emission Point: 00015		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.606	NYTME (km.): 619.634	Building: UMR
Emission Point: 00016		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.605	NYTME (km.): 619.63	Building: UMR
Emission Point: 00017		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.605	NYTME (km.): 619.626	Building: UMR
Emission Point: 00018		
Height (ft.): 31	Diameter (in.): 6	
NYTMN (km.): 4946.605	NYTME (km.): 619.621	Building: UMR
Emission Point: 00019		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.591	NYTME (km.): 619.612	Building: UMR
Emission Point: 00020		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.598	NYTME (km.): 619.643	Building: UMR
Emission Point: 00021		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.598	NYTME (km.): 619.64	Building: UMR
Emission Point: 00022		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.597	NYTME (km.): 619.636	Building: UMR
Emission Point: 00023		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.597	NYTME (km.): 619.633	Building: UMR
Emission Point: 00024		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.597	NYTME (km.): 619.63	Building: UMR
Emission Point: 00025		

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Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.596	NYTME (km.): 619.627	Building: UMR
Emission Point: 00026		
Height (ft.): 32	Diameter (in.): 6	
NYTMN (km.): 4946.596	NYTME (km.): 619.624	Building: UMR
Emission Point: 00071		
Height (ft.): 45	Diameter (in.): 28	
NYTMN (km.): 4946.62	NYTME (km.): 619.669	Building: UMR

Item 52.2:

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

Emission Unit: 2-0SSLP		
Emission Point: 00061		
Height (ft.): 31	Diameter (in.): 8	
NYTMN (km.): 4946.496	NYTME (km.): 619.7	Building: SSLP
Emission Point: 00062		
Height (ft.): 14	Diameter (in.): 24	
NYTMN (km.): 4946.59	NYTME (km.): 619.701	Building: SSLP
Emission Point: 00063		
Height (ft.): 32	Diameter (in.): 24	
NYTMN (km.): 4946.702	NYTME (km.): 619.703	Building: SSLP

Item 52.3:

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

Emission Unit: 3-COMBU		
Emission Point: 00001		
Height (ft.): 40	Diameter (in.): 2	
NYTMN (km.): 4946.587	NYTME (km.): 619.657	Building: UMR

Item 52.4:

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

Emission Unit: 4-00KB4		
Emission Point: 00081		
Height (ft.): 47	Length (in.): 85	Width (in.): 85
NYTMN (km.): 4946.62	NYTME (km.): 619.669	Building: KB4
Emission Point: 00086		
Height (ft.): 47	Diameter (in.): 8	
NYTMN (km.): 4946.62	NYTME (km.): 619.669	Building: KB4
Emission Point: 00088		
Height (ft.): 47	Diameter (in.): 24	

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Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS3 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS4 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS5 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS6 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS7 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS8 - Process
Design Capacity: 4,066 pounds per day

Item 53.3:

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

Emission Unit: 1-00UMR
Process: MLP Source Classification Code: 3-08-008-02
Process Description: Purge of molding presses.

Emission Source/Control: MPRS1 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS2 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS3 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS4 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS5 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS6 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS7 - Process
Design Capacity: 4,066 pounds per day

Emission Source/Control: MPRS8 - Process
Design Capacity: 4,066 pounds per day

Item 53.4:

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

Emission Unit: 1-00UMR

Process: PXP

Source Classification Code: 3-08-008-01

Process Description:

Pre-expansion process that softens the polystyrene beads and starts the expansion process. The process emissions shall be control by the Regenerative Thermal Oxidizer (DURR RTO). Source/control RT001 and RT002 are one source control. Added as separate emission source/control just for the permitting process.

Emission Source/Control: RT001 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: FLBED - Process

Emission Source/Control: MNVSL - Process

Emission Source/Control: PXPRM - Process

Item 53.5:

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

Emission Unit: 1-00UMR

Process: SIS

Source Classification Code: 3-08-008-03

Process Description:

Area (Silo Room) where raw beads are stored prior to processing. The process emissions shall be controlled by the Regenerative Thermal Oxidizer (DURR RTO). Source/control RT001 and RT002 are one source control. Added as separate emission source/control just for the permitting process.

Emission Source/Control: RT001 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: SIL01 - Process

Item 53.6:

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

Emission Unit: 1-00UMR

Process: WHU

Source Classification Code: 3-01-018-99

Process Description:

Inventory storage of packaged units (finished goods) from SSLP and UMR are transferred to on-site warehouse prior to shipment to retailers or wholesalers (Fugitive emissions). The warehouse is located under UMR unit.

Emission Source/Control: WSHUM - Process

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Facility DEC ID: 5094200510

Item 53.7:

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

Emission Unit: 2-0SSLP

Process: CPA

Source Classification Code: 3-01-018-99

Process Description:

A portion of the finished Kerdi-Board is cut and milled to dimension and assembled into shaped products.

Emission Source/Control: MANGL - Process

Emission Source/Control: PNLML - Process

Item 53.8:

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

Emission Unit: 2-0SSLP

Process: LAM

Source Classification Code: 3-01-018-85

Process Description:

Laminating line to apply face sheets to a foam core to produce a product called Kerdi-Board. The face sheets are applied with hot melt polyurethane moisture cure adhesive (Hot Melt Glue). The foam core is an extruded polystyrene (XPS) web that is delivered to the facility in bulk rolls.

Emission Source/Control: ERBO1 - Control

Control Type: FABRIC FILTER

Emission Source/Control: ADHAP - Process

Design Capacity: 12 meters per minute

Emission Source/Control: BKSAW - Process

Emission Source/Control: PRINT - Process

Item 53.9:

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

Emission Unit: 2-0SSLP

Process: RLS

Source Classification Code: 3-01-018-93

Process Description:

Storage of bulk extruded polystyrene (XPS) web rolls. Storage allows material to age to obtain optimal properties for further processing. The process emissions shall be controlled by the Regenerative Thermal Oxidizer (DURR RTO). Source/control RT001 and RT002 are one source control. Added as separate emission source/control just for the permitting process.

Emission Source/Control: RT002 - Control

Control Type: THERMAL OXIDATION

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Emission Source/Control: ROLST - Process

Item 53.10:

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

Emission Unit: 2-0SSLP
 Process: WHS Source Classification Code: 3-01-018-11
 Process Description:
 Warehouse storage of product inventory (Fugitive emissions).

Emission Source/Control: WHSSL - Process

Item 53.11:

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

Emission Unit: 3-COMBU
 Process: COM Source Classification Code: 3-02-999-98
 Process Description:
 Natural gas combustion for generating steam for use in UMR molding process and as part of the regenerative thermal oxidizer (RTO) for VOC control.

Emission Source/Control: BOIL1 - Combustion
 Design Capacity: 10.04 million Btu per hour

Item 53.12:

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

Emission Unit: 4-00KB4
 Process: CAP Source Classification Code: 3-01-018-85
 Process Description:
 A portion of the finished boards are further processed in secondary operations to build smaller shower features. The boards are cut to smaller dimensions with panel saw and milling equipment (K12PAN), and assembled with polyurethane adhesive (K13GLU) into curbs, benches and niches. The assembled items are packaged and sent to storage for subsequent transport to market. Local dust control exhausts internally. Emissions from this process are treated as fugitive emissions.

Emission Source/Control: K12PA - Process

Emission Source/Control: K13GL - Process

Item 53.13:

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

Emission Unit: 4-00KB4
 Process: EXT Source Classification Code: 3-01-018-85

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Process Description:

The extrusion process heats raw polystyrene resin and mixes it with a blowing agent. With the application of heat the blowing agents are pressurized within the resin. The pressurized resin is extruded through a die to create a flat expanded foam extrusion board of a desired thickness. For certain products, a thicker board stock is produced by thermobonding (Heat Welding) one piece of the extruded web on top of another piece. Ventilation hoods convey blowing agent gases from the area around the extruder die (K1EXT) and the area around the thermobonding unit (K2THV) to emission Point 00081.

Emission Source/Control: K1EXT - Process
Design Capacity: 353,146.667 cubic feet per hour

Emission Source/Control: K2THV - Process
Design Capacity: 176,573.334 cubic feet per hour

Item 53.14:

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

Emission Unit: 4-00KB4

Process: GLU

Source Classification Code: 3-01-018-85

Process Description:

The laminating operation applies facer and fleece face sheets to the extruded boards with adhesive, cuts the boards to final product dimensions and prints product information on the finished boards. The facer and fleece face sheets are applied with polyurethane hot melt moisture cure adhesive. The adhesive is solid at room temperature. It is liquefied in heated drums and pumped into the laminating equipment where it is applied to the substrata with rollers. A ventilation hood (K8ADH) controls odor at the adhesive application module, discharge to emission point 00086. The UV Cured Flexographic printing equipment is enclosed in the printing module (K9PRI) which discharges to emission point 00088. A central dust control unit (K11DC) captures dust from the crosscut saw and lateral cutting and milling equipment that establish the final laminated board dimensions (K10BS). The dust control unit discharges inside the building.

Emission Source/Control: K11DC - Control
Control Type: FABRIC FILTER

Emission Source/Control: K10BS - Process

Emission Source/Control: K8ADH - Process
Design Capacity: 12 meters per second

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Emission Source/Control: K9PRI - Process

Item 53.15:

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

Emission Unit: 4-00KB4

Process: PSR

Source Classification Code: 3-01-018-85

Process Description:

Extruded foam board is cut and milled immediately after extrusion (prior to going into interim storage) and upon coming out of storage. Bulk cut-off and foam dust generated during these cutting and milling operations are captured and returned to the extrusion process for re-use after the recycling process, being combined with raw resin to reduce waste. The recycling system consists of a pneumatic material transport system that accumulates the recovered material into a 'fluff' silo, followed by a re-granulation process and finally stored as useable material in a bulk silo. Two baghouse filters (K4BHA and K4BHB) control emissions from the cutting and milling operations (K6CUT). A third unit (K5RFL), equipped with fiber filter media, control emissions from regranulating/Agglomerating equipment in the recycling room. All of the dust control equipment discharges to emission point 00081.

Emission Source/Control: K4BHA - Control

Control Type: FABRIC FILTER

Emission Source/Control: K4BHB - Control

Control Type: FABRIC FILTER

Emission Source/Control: K5RFL - Control

Control Type: FABRIC FILTER

Emission Source/Control: K6CUT - Process

Emission Source/Control: K7AGG - Process

**Condition 54: Owners or operators of applicable emission points commences construction after August 15, 1994
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 212-3.1 (f)

Item 54.1:

This Condition applies to:

Emission Unit: 20SSLP

Process: RLS

Emission Source: ROLST

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Item 54.1:

This Condition applies to Emission Unit: 1-00UMR Emission Point: 00014
Process: MLD

Item 54.2.3:

Owners and/or operators of emission points located at facilities described in 6 NYCRR 212-3.1(a) that commence construction after August 15, 1994 must submit a RACT demonstration for nitrogen oxides and VOC emissions with each application for a permit to operate. RACT must be implemented on these emission points when operation commences. A RACT analysis is not required for new emission points with NO_x and VOC emission rate potentials less than 3.0 pounds per hour and actual emissions in the absence of control equipment less than 15.0 pounds per day at facilities located outside of the Lower Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury and New York City metropolitan area.

Condition 55: Compliance Certification
Effective for entire length of Permit

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

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-0SSLP

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

Item 55.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Work practices shall be employed at facilities where the total actual VOC emissions from all industrial adhesive application processes, including related cleaning activities, equal or exceed three tons in a 12-month rolling period, before consideration of emission control equipment. Work practices shall include:

(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

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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 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,

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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: 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: 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

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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 applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 56: Contaminant List
Effective for entire length of Permit

Applicable State Requirement: ECL 19-0301

Item 56.1:

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

CAS No: 000101-68-8

Name: METHYLENE BISPHENYL ISOCYANATE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

Condition 57: Malfunctions and Start-up/Shutdown Activities
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 201-1.4

Item 57.1:

(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.

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(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 58: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 201-6.5 (a)

Item 58.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 58.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As discussed in the August 11, 2025 Climate Leadership and Community Protection Act (CLCPA) analysis and updated information provided by the applicant on October 9, 2025

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for this project, the facility owner or operator shall cease operation of the Kerdi-Board process (Emission Unit 2-0SSLP) within one year of standard/stable operations of KB4 (Emission Unit 4--0KB4), but no later than January 31, 2030.

The facility owner or operator shall provide written notification to the department within 15 days of ceasing operation of Emission Unit 2-0SSLP. Such notification shall include the date operation ceased and provide documentation that the associated equipment has been disconnected or otherwise rendered inoperative.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

Condition 59: Air pollution prohibited
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 211.1

Item 59.1:

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 60: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 212-2.2

Item 60.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000101-68-8 METHYLENE BISPHENYL ISOCYANATE

Item 60.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Methylene Bisphenyl Isocyanate (MDI) emissions from all

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facility operations shall be limited to less than 10 pounds per year (lb/y) during all consecutive twelve (12) month periods. The MDI limit is based on the Air dispersion modelling submitted by the facility. An emission performance test shall be conducted within 180 days of standard/stable production of KB4 to confirm actual emissions. If the emission rate from the performance testing is found to exceed the original calculated value, the permittee must submit a modification application with Air dispersion modelling to address such exceedance within 60 days for compliance demonstration, and must obtain Department's approval on a method to operate within the 10 pounds per year limit pending review of the application.

Each calendar month, the facility-wide 12-month rolling total for Methylene Bisphenyl Isocyanate (MDI) emissions shall be computed by adding the current monthly MDI emissions to the MDI emissions for the previous 11 months.

The facility shall maintain the purchase and inventory records of all MDI containing materials for all sources updated monthly. Documentation (e.g., certification from the supplier/manufacturer) which lists the parameters used to determine the actual MDI content of each material used shall be maintained as well. Purchase and usage logs, records shall be maintained onsite to verify the material usage and Methylene Bisphenyl Isocyanate (MDI) emissions on a twelve (12) month total, rolled monthly, basis for all emission sources.

The facility shall submit to the Regional Office of the Department, an annual Methylene Bisphenyl Isocyanate (MDI) emissions report which certifies that the facility has been operated within the limits imposed by the emission limit. The report shall list the monthly MDI emission for each source, the total monthly MDI emissions, the rolling 12-month total MDI emissions for each consecutive month of the calendar year and a comparison to the 10 pounds per year (lb/y) limit for the facility.

The owner or operator of the permitted facility shall maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

Parameter Monitored: METHYLENE BISPHENYL ISOCYANATE

Upper Permit Limit: 10 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

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Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

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