



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 5-1705-00095/00002
Effective Date: 02/28/2019 Expiration Date: 02/27/2029

Permit Issued To: TAYLOR MADE GROUP LLC
65 HARRISON ST
GLOVERSVILLE, NY 12078-4738

Contact: JIM DERUSCIO
66 KINGSBORO AVE
PO BOX 1190
GLOVERSVILLE, NY 12078
(518) 773-9261

Facility: TAYLOR MADE PRODUCTS
16 INDUSTRIAL PKWY
GLOVERSVILLE, NY 12078

Description:

Taylor made Products manufactures resin-based marine accessories for recreational boating. The production process involves a molding operation to create fiberglass dock boxes using a closed-mold, resin transfer process. The process occurs within one of two existing booths. The facility is restricted to emitting 9.5 tons per year or less of Styrene and 24.5 tons per year or less of total Hazardous Air Pollutants (HAP).

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: MARC S MIGLIORE
NYSDEC - WARRENSBURG SUBOFFICE
232 GOLF COURSE RD
WARRENSBURG, NY 12885

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG



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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

Item 3.3

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



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

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 5
SUBOFFICE - WARRENSBURG
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 Sub-office
Division of Environmental Permits
232 Golf Course Road
Warrensburg, NY 12885-1172
(518) 623-1281

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Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: TAYLOR MADE GROUP LLC
65 HARRISON ST
GLOVERSVILLE, NY 12078-4738

Facility: TAYLOR MADE PRODUCTS
16 INDUSTRIAL PKWY
GLOVERSVILLE, NY 12078

Authorized Activity By Standard Industrial Classification Code:
3089 - PLASTICS PRODUCTS, NEC

Permit Effective Date: 02/28/2019

Permit Expiration Date: 02/27/2029



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (e): Compliance Demonstration
- 3 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *6 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 7 6 NYCRR 211.2: Visible Emissions Limited
- 8 6 NYCRR 212-1.5 (g): Maintain all process emission sources, including the associated air pollution control and monitoring equipment
- 9 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 10 6 NYCRR 212-2.4 (b): Compliance Demonstration
- 11 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 12 6 NYCRR 228-1.4 (b) (5): Compliance Demonstration

Emission Unit Level

EU=1--MOLD

- 13 6 NYCRR 228-1.3 (b) (2): Compliance Demonstration
- 14 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 15 6 NYCRR 228-1.3 (e): Surface Coating- application requirements
- 16 6 NYCRR 228-1.6 (a): Compliance Demonstration
- 17 6 NYCRR 228-1.6 (h): Compliance Demonstration

EU=1--MOLD,Proc=M-D

- 18 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 19 ECL 19-0301: Contaminant List
- 20 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 21 6 NYCRR Subpart 201-5: Emission Unit Definition
- 22 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 23 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 24 6 NYCRR 211.1: Air pollution prohibited
- 25 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 26 6 NYCRR 212-2.3 (b): Compliance Demonstration

Emission Unit Level

- 27 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 28 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial



Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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



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

FEDERAL APPLICABLE REQUIREMENTS

The following conditions are federally enforceable.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

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

Condition 2: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029

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

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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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. 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

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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 1/30/2020.
Subsequent reports are due on the same day each year

Condition 3: Facility Permissible Emissions
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 3.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 000100-42-5 Name: STYRENE	PTE: 19,000 pounds per year
CAS No: 0NY100-00-0 Name: TOTAL HAP	PTE: 49,000 pounds per year
CAS No: 0NY998-00-0 Name: VOC	PTE: 90,000 pounds per year

Condition 4: Capping Monitoring Condition
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 4.1:

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

6 NYCRR Subpart 201-6

Item 4.2:

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

Item 4.3:

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Parameter Monitored: VOC

Upper Permit Limit: 45 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2020.

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

Condition 5: Capping Monitoring Condition
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 5.1:

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

6 NYCRR Subpart 201-6
40 CFR 63.5785

Item 5.2:

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

Item 5.3:

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

Item 5.4:

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

Item 5.5:

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

Item 5.6:

The Compliance Demonstration activity will be performed for the Facility.

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emissions subject to the cap for that time period and a comparison to those threshold levels that would require the submission of a Title V facility permit or compliance with an applicable requirement.

Parameter Monitored: TOTAL HAP
Upper Permit Limit: 24.5 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2020.
Subsequent reports are due every 12 calendar month(s).

Condition 7: Visible Emissions Limited
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable Federal Requirement:6 NYCRR 211.2

Item 7.1:

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

Condition 8: Maintain all process emission sources, including the associated air pollution control and monitoring equipment
Effective between the dates of 02/28/2019 and 02/27/2029

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

Item 8.1:

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 9: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029

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

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 9.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct and record observations of visible emissions from the emission unit, process, etc. to which this condition applies on a weekly basis. The permittee will immediately investigate any instance where there is cause to believe that there are any visible emissions occurring or have occurred from a process source.

If any visible emissions are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If any visible emissions are present after corrections are made, the permittee will conduct a Method 9 assessment within 24 hours to determine the degree of opacity. Permittee shall notify the Department immediately, if the opacity is greater than the upper limit noted below.

Records of visible emissions observations, investigations, corrective actions and Method 9 assessments shall be kept in a format acceptable to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029

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

Item 10.1:

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

Emission Unit: 1--MOLD

Emission Point: EP001

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Emission Unit: 1--MOLD

Emission Point: EP002

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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

(1) No facility owner or operator shall cause or allow emissions of particulate that exceed 0.05 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

Per 6NYCRR, Subpart 202-1, in order to determine compliance or noncompliance with this emission limit, the source owner is required to submit an acceptable report of measured emissions at the Department's discretion.

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 11: Compliance Demonstration

Effective between the dates of 02/28/2019 and 02/27/2029

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

Item 11.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1--MOLD

Emission Point: EP001

Emission Unit: 1--MOLD

Emission Point: EP002

Item 11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct and record observations of visible emissions from the emission unit, process, etc. to which this condition applies on a weekly basis. The permittee will immediately investigate any instance where there is cause to believe that there are any visible emissions occurring or have occurred from a process source.

If any visible emissions are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If any visible emissions are present after corrections are made, the permittee will conduct a Method 9 assessment within 24 hours to determine the degree of opacity. Permittee shall notify the Department immediately, if the opacity is greater than the upper limit noted below

Records of visible emissions observations, investigations, corrective actions and Method 9 assessments shall be kept in a format acceptable to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable Federal Requirement: 6 NYCRR 228-1.4 (b) (5)

Item 12.1:

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

Emission Unit: 1--MOLD

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility operating a Miscellaneous Plastic Parts coating line may not use coatings with VOC contents, as applied, which exceed the appropriate limits specified in Table B5 of 6 NYCRR Subpart 228-1.4(b)(5). The units in Table B5 are in terms of pounds of VOC per gallon of coating (minus water and excluded compounds) at application. Sampling and testing of any coating to confirm VOC content compliance must be performed in a manner directed by and at the request of the Department.

Mold Seal is limited to a maximum VOC content of 6.3 pounds per gallon.

Exempted from the VOC content limits of table B5 are any individual coating category used in volumes less than 50 gallons in any 12 month period, if substitute compliant coatings are not available, provided that the total usage of all such coatings does not exceed 200 gallons in a 12 month period. Records of such coating must be maintained in accordance with section 228-1.3(b)(2) of this Subpart of the general requirements

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**** Emission Unit Level ****

Condition 13: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (2)

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1--MOLD



Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners and operators of emission sources not subject to 6 NYCRR Part 228-1, as set forth in Paragraphs 228-1.1(b)(9) or (13), or those sources that are using coatings not subject to specific requirements of Part 228-1 as set forth in Paragraph 228-1.3(e)(2), or Clauses 228-1.4(b)(5)(iii)(e), 228-1.4(b)(5)(iii)(i) or 228-1.4(b)(5)(iv), must maintain records on an as used basis. The records must include the relevant regulatory citation of each exemption and quantity of coating used. If the exemption criteria are based on VOC usage, the records must contain calculations and supplier/manufacturer material data sheets for verification of VOC usage. All records required by this Paragraph must be maintained at the facility for a period of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 14: Surface Coating - Handling, storage and disposal
Effective between the dates of 02/28/2019 and 02/27/2029**

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

Item 14.1:

This Condition applies to Emission Unit: 1--MOLD

Item 14.2:

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

- (1) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;



- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
 - (i) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Condition 15: Surface Coating- application requirements
Effective between the dates of 02/28/2019 and 02/27/2029

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

Item 15.1:

This Condition applies to Emission Unit: 1--MOLD

Item 15.2:

Facilities operating coating lines must use one or more of the following application techniques to apply the coating:

- (i) flow/curtain coating;
- (ii) dip coating;
- (iii) cotton-tipped swab application;
- (iv) electro-deposition coating;
- (v) high volume low pressure spraying;
- (vi) electrostatic spray;
- (vii) airless spray, (including air assisted);
- (viii) airbrush application methods for stenciling, lettering, and other identification markings; or
- (ix) other coating application methods approved by the department which can demonstrate transfer efficiencies equivalent to or greater than high volume low pressure spray.

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Condition 16: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable Federal Requirement:6 NYCRR 228-1.6 (a)

Item 16.1:

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

Emission Unit: 1--MOLD
Process: M-D

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Reference Test Method: EPA Reference Test Method 311 or 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable Federal Requirement:6 NYCRR 228-1.6 (h)

Item 17.1:

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

Emission Unit: 1--MOLD
Process: M-D

Item 17.2:

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 18: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1--MOLD

Process: M-D

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

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Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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 by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 19: Contaminant List
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable State Requirement:ECL 19-0301

Item 19.1:

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

CAS No: 000100-42-5

Name: STYRENE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY998-00-0



Name: VOC

Condition 20: Malfunctions and start-up/shutdown activities
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable State Requirement:6 NYCRR 201-1.4

Item 20.1:

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

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

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

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

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

Condition 21: Emission Unit Definition
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 21.1:

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

New York State Department of Environmental Conservation

Permit ID: 5-1705-00095/00002

Facility DEC ID: 5170500095



Emission Unit: 1--MOLD

Emission Unit Description:

The emission unit (1-MOLD) consists of the two fiberglass dock box closed molding operations utilizing gelcoats and resins: one for production molding and one for repair/production molding.

Building(s): BLDG 1

**Condition 22: Renewal deadlines for state facility permits
Effective between the dates of 02/28/2019 and 02/27/2029**

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

Item 22.1:

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

**Condition 23: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029**

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

Item 23.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 5
232 Golf Course Rd.
Warrensburg, NY 12885

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2020.
Subsequent reports are due every 12 calendar month(s).

**Condition 24: Air pollution prohibited
Effective between the dates of 02/28/2019 and 02/27/2029**

Applicable State Requirement:6 NYCRR 211.1

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Item 24.1:

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 25: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable State Requirement:6 NYCRR 212-2.1 (a)

Item 25.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For an air contaminant listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant List, of this Part, the facility owner or operator shall demonstrate compliance with the air cleaning requirements for the HTAC as specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants.

For an HTAC assigned an Environmental Rating of A and has an Emission Rate Potential (ERP) of less than 0.1 pound per hour and annual mass emissions of a persistent and bioaccumulative compound less than the PB Trigger, the owner or operator is required to meet the short term and annual guideline concentration at the fence line of the facility.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: ANNUAL TOTAL

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 26: Compliance Demonstration
Effective between the dates of 02/28/2019 and 02/27/2029

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

Item 26.1:

The Compliance Demonstration activity will be performed for the Facility.

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Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants for the environmental rating assigned to the contaminant by the department.

A process emission source emitting a Non-HTAC non-criteria air contaminant and having an emission rate potential (ERP) of less than 0.1 pound per hour and an Environmental Rating of A must meet the annual and short term guideline concentrations for the air contaminant at the fenceline of the facility.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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

Condition 27: Emission Point Definition By Emission Unit
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 27.1:

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

Emission Unit: 1--MOLD

Emission Point: EP001

Height (ft.): 30 Diameter (in.): 24
NYTMN (km.): 4764.7 NYTME (km.): 552.5 Building: BLDG 1

Emission Point: EP002

Height (ft.): 28 Diameter (in.): 30
NYTMN (km.): 4764.7 NYTME (km.): 552.5 Building: BLDG 1

Condition 28: Process Definition By Emission Unit
Effective between the dates of 02/28/2019 and 02/27/2029

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 28.1:



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

Emission Unit: 1--MOLD

Process: M-D

Source Classification Code: 3-08-007-36

Process Description:

The molding process (M-D) consists of the two fiberglass dock boxes; one closed molding and one open molding operations utilizing gelcoats and resins: one for production molding and one for repair/production molding.

Emission Source/Control: MLD01 - Process

Emission Source/Control: MLD02 - Process