

Facility DEC ID: 5415200205

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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 5-4152-00205/00017  
Effective Date: 05/07/2020 Expiration Date: 05/06/2030

Permit Issued To: POLYSET COMPANY INC  
PO Box 111  
Mechanicville, NY 12118-0111

Contact: RAJAT GHOSHAL  
65 HUDSON AVE  
MECHANICVILLE, NY 12118  
(518) 664-6013

Facility: POLYSET COMPANY  
65 Hudson Ave  
Stillwater, NY 12118

Description:  
Polyset is a resin manufacturing facility and is a leader in the polyurethane adhesive, elastomer, and foam systems for industrial air filtration systems. The facility has four (4) 1,000 gallon reactors used to produce thier Polyol products and one (1) 350 gallon reactor to repackage premade isocyanate products. The reactors are cleaned using methylene chloride and a distillation column purifies the used methylene chloride.

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: BETH A MAGEE  
NYSDEC - WARRENSBURG SUBOFFICE  
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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**Facility Level**

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

**Condition 4: Relationship of this Permit to Other Department Orders and Determinations**  
**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 4.1:**

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

**Item 6.1:**

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 6.2:**

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

**Item 6.3**

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

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**Condition 8: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6 NYCRR 621.13**

**Item 8.1:**

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 9: Submission of application for permit modification or renewal-REGION 5**  
**SUBOFFICE - WARRENSBURG**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 9.1:**

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

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Permit Issued To: POLYSET COMPANY INC  
PO Box 111  
Mechanicville, NY 12118-0111

Facility: POLYSET COMPANY  
65 Hudson Ave  
Stillwater, NY 12118

Authorized Activity By Standard Industrial Classification Code:  
2891 - ADHESIVES AND SEALANTS  
2899 - CHEMICAL PREPARATIONS, NEC

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NOTE: \* preceding the condition number indicates capping.

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**FEDERALLY ENFORCEABLE CONDITIONS**

FINAL

\*\*\*\* Facility Level \*\*\*\*

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

**Item A: Sealing - 6 NYCRR 200.5**

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

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

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

**Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6**

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

**Item C: Maintenance of Equipment - 6 NYCRR 200.7**

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



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required to operate such device effectively.

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

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**

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**Activities - 6 NYCRR 201-3.3 (a)**

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

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

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

**Item J: Open Fires Prohibitions - 6 NYCRR 215.2**

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

**Item K: Permit Exclusion - ECL 19-0305**

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

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

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

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 1: Open Fires - Prohibitions**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**Applicable Federal Requirement: 6 NYCRR 215.2**

**Item 1.1:**

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 1.2**

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.

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

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

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

**Condition 2: Maintenance of Equipment**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 2.1:**

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 3: Required Emissions Tests**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

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

**Item 3.1:**

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

**Condition 4: Facility Permissible Emissions**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 4.1:**

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

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

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

PTE: 9,500 pounds per year

**Condition 5: Capping Monitoring Condition**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**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:

40 CFR 63.11496 (a)

**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.

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

**Item 5.7:**

Compliance Demonstration shall include the following monitoring:

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

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Monitoring Description:

Facility-wide emissions of total organic HAPs shall not exceed 4.75 tons per year (i.e., 9,500 pounds per year) as determined by summing monthly emissions during any consecutive 12-month period, rolled monthly. This caps facility-wide emissions below the 10,000 pound per year threshold that would subject the facility to the requirements of Table 2 of the Appendix to 40 CFR 63, Subpart VVVVVV – Emission Limits and Compliance Requirements for Batch Process Vents.

The owner or operator must keep a record of the number of batches of each process operated per month for batch process vents from a chemical manufacturing process unit where the current estimate of emissions is less than 9,500 pounds per year. Records shall be maintained on-site to document compliance with this cap. The facility will track emissions from the cleaning and distillation process on both monthly and 12-month rolling total bases.

Parameter Monitored: TOTAL HAP  
 Upper Permit Limit: 9,500 pounds per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 10/30/2020.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 6: Visible Emissions Limited**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 6.1:**  
 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 7: Compliance Demonstration**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

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

**Item 7.1:**  
 The Compliance Demonstration activity will be performed for the Facility.

**Item 7.2:**  
 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 facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 8: Process Vessel Cover**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**Applicable Federal Requirement: 40CFR 63.11495(a)(1), Subpart VVVVVV**

**Item 8.1:**

Each process vessel must be equipped with a cover or lid that must be closed at all times when it is in organic HAP service or metal HAP service, except for manual operations that require access, such as material addition and removal, inspection, sampling and cleaning. This requirement does not apply to process vessels containing only metal HAP that are in a liquid solution or other form that will not result in particulate emissions of metal HAP (e.g., metal HAP that is in ingot, paste, slurry, or moist pellet form or other form).

**Condition 9: Inspections**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**Applicable Federal Requirement: 40CFR 63.11495(a)(3), Subpart VVVVVV**

**Item 9.1:**

The owner or operator must conduct inspections of process vessels and equipment for each chemical manufacturing process unit (CMPU) in organic HAP service or metal HAP service, as specified in paragraphs (i) through (v), to demonstrate compliance with 40 CFR 63.11495(a)(1) and to determine that the process vessels and equipment are sound and free of leaks. Alternatively, except when the subject CMPU contains metal HAP as particulate, inspections may be conducted while the subject process vessels and equipment are in VOC service, provided that leaks can be detected when in VOC service.

(i) Inspections must be conducted at least quarterly.

(ii) For these inspections, detection methods incorporating sight, sound, or smell are acceptable. Indications of a leak identified using such methods constitute a leak unless the owner or operator demonstrates that the indications of a leak are due to a condition other than loss of HAP. If indications of a leak are determined not to be HAP in one quarterly monitoring period,

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the owner or operator must still perform the inspection and demonstration in the next quarterly monitoring period.

(iii) As an alternative to conducting inspections, as specified in paragraph (ii), the owner or operator may use Method 21 of 40 CFR part 60, appendix A-7, with a leak definition of 500 ppmv to detect leaks. The owner or operator may also use Method 21 with a leak definition of 500 ppmv to determine if indications of a leak identified during an inspection conducted in accordance with paragraph (ii) are due to a condition other than loss of HAP. The procedures in this paragraph may not be used as an alternative to the inspection required by paragraph (ii) for process vessels that contain metal HAP as particulate.

(iv) Inspections must be conducted while the subject CMPU is operating.

(v) No inspection is required in a calendar quarter during which the subject CMPU does not operate for the entire calendar quarter and is not in organic HAP service or metal HAP service. If the CMPU operates at all during a calendar quarter, an inspection is required.

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**Applicable Federal Requirement: 40CFR 63.11495(a)(4), Subpart VVVVVV**

**Item 10.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must repair any leak within 15 calendar days after detection of the leak, or document the reason for any delay of repair. For the purposes of this paragraph, a leak will be considered “repaired” if a condition specified in paragraph (i), (ii), or (iii) is met.

(i) The visual, audible, olfactory, or other indications of a leak to the atmosphere have been eliminated,  
 or

(ii) No bubbles are observed at potential leak sites during a leak check using soap solution, or

(iii) The system will hold a test pressure.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 11: Compliance Demonstration**



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Applicable Federal Requirement:40CFR 63.11495(a)(5), Subpart VVVVVV

**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must keep records of the dates and results of each inspection event, the dates of equipment repairs, and, if applicable, the reasons for any delay in repair.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 12: Compliance Demonstration**

Effective between the dates of 05/07/2020 and 05/06/2030

Applicable Federal Requirement:40CFR 63.11501(c)(1), Subpart VVVVVV

**Item 12.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must keep a record of the number of batches of each process operated per month for batch process vents from a chemical manufacturing process unit where the current estimate of emissions is less than 10,000 pounds per year. The owner or operator must reevaluate the total emissions from batch process vents prior to making any process changes that affect emission calculations in 40 CFR 63.11496(a)(1) and (2). If projected emissions increase to 10,000 lb/yr or more, the owner or operator must be in compliance with options for batch process vents in Table 2 to subpart VVVVVV upon initiating operation under the new operating conditions. The owner or operator must maintain records documenting the results of all updated emissions calculations. Reports shall be submitted pursuant to 40 CFR 63.11501(d).

Monitoring Frequency: MONTHLY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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**Condition 13: Semiannual Compliance Reports**

Effective between the dates of 05/07/2020 and 05/06/2030

**Applicable Federal Requirement: 40CFR 63.11501(d), Subpart VVVVVV****Item 13.1:**

The owner or operator must submit semiannual compliance reports that contain the information specified in paragraphs (1) through (7), as applicable. Reports are required only for semiannual periods during which the owner or operator experienced any of the events described in paragraphs (1) through (8).

(1) Deviations. The owner or operator must clearly identify any deviation from the requirements of this subpart.

(2) Delay of repair for a large heat exchange system. The owner or operator must include the information specified in 40 CFR 63.104(f)(2) each time he/she invokes the delay of repair provisions for a heat exchange system with a cooling water flow rate equal to or greater than 8,000 gal/min.

(3) Delay of leak repair. The owner or operator must provide the following information for each delay of leak repair beyond 15 days for any process equipment, storage tank, surge control vessel, bottoms receiver, and each delay of leak repair beyond 45 days for any heat exchange system with a cooling water flow rate less than 8,000 gal/min: information on the date the leak was identified, the reason for the delay in repair, and the date the leak was repaired.

(4) Process change. The owner or operator must report each process change that affects a compliance determination and submit a new certification of compliance with the applicable requirements in accordance with the procedures specified in 40 CFR 63.15001(b).

(5) Data for the alternative standard. If the owner or operator complies with the alternative standard, as specified in Table 2 of subpart VVVVVV or Table 3 of subpart VVVVVV, report the information required in 40 CFR 63.1258(b)(5).

(6) Overlapping rule requirements. Report any changes in the overlapping provisions with which the owner or operator complies.

(7) Reactive and resinous materials. Report any transfer of liquids that are reactive or resinous materials, as defined in 40 CFR 63.11502(b), and not included in the notification of compliance status.

(8) Malfunctions. If a malfunction occurred during the reporting period, the report must include the number of instances of malfunctions that caused emissions in excess of a standard. For each malfunction that caused emissions in excess of a standard, the report must include a list of the affected sources or equipment, an estimate of the volume of each regulated pollutant emitted over the standard, and a description of the method used to estimate the emissions. The report must also include a description of actions the owner or operator took during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.11495(d), including actions taken to correct a malfunction.

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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 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.

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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 14: Contaminant List**

Effective between the dates of 05/07/2020 and 05/06/2030

**Applicable State Requirement:ECL 19-0301**

**Item 14.1:**

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

CAS No: 0NY100-00-0

Name: TOTAL HAP

**Condition 15: Malfunctions and start-up/shutdown activities**

Effective between the dates of 05/07/2020 and 05/06/2030

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 15.1:**

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(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 16: Emission Unit Definition**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

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

**Item 16.1:**

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

Emission Unit: U--DIST

Emission Unit Description:

50 gallon distillation unit for used methylene chloride.

Building(s): MAIN

**Item 16.2:**

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

Emission Unit: U--ISOC

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Facility DEC ID: 5415200205

Emission Unit Description:

350 gallon reactor used for the isocyanate repacking process

Building(s): MAIN

**Item 16.3:**

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

Emission Unit: U--POLY

Emission Unit Description:

Four (4) 1,000 gallon reactors are used to produce Polyol which is located in the liquid resins and coatings production area. Each batch takes 6-8 hours of mixing. A vacuum is used to remove the moisture within the reactor in the first three hours of mixing.

Building(s): MAIN

**Condition 17: Renewal deadlines for state facility permits**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

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

**Item 17.1:**

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 18: CLCPA Applicability**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

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

**Item 18.1:**

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

**Condition 19: Compliance Demonstration**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

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

**Item 19.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 19.2:**

Compliance Demonstration shall include the following monitoring:

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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 10/30/2020.

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

**Condition 20: Air pollution prohibited**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 20.1:**

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 21: Compliance Demonstration**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**Applicable State Requirement:6 NYCRR 212-2.1**

**Item 21.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 21.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point are restricted as follows:

(a) For an air contaminant listed in Section 212-2.2 Table 2 - High Toxicity Air Contaminant List, of this Part, the



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facility owner or operator shall either limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC; or 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, of this Part for the environmental rating assigned to the contaminant by the department.

(b) For any air contaminant not listed on Table 2, unless it is solid particulate described in subdivision (c) of this Section, the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(a), Table 3 - Degree of Air Cleaning Required for Criteria Air Contaminants, or Subdivision 212-2.3(b), Table 4 - Degree of Air Cleaning Required for Non-Criteria Air Contaminants, as applicable, for the environmental rating assigned to the contaminant by the department.

(c) For a solid particulate assigned an environmental rating of B or C emitted from a process emission source, the facility owner or operator shall not allow emissions of particulate to exceed the requirements specified in Subpart 212-2.4 of this Part.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 22: Compliance Demonstration**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

**Applicable State Requirement:6 NYCRR 212-2.1**

**Item 22.1:**

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

Emission Unit: U--ISOC

Process: ISO

Emission Source: ESR10

**Item 22.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility must not exceed 1,260 batches per year for Reactor 10 (ESR10). This ensures that the AGC and SGC

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concentrations are met. Records must be maintained onsite showing the rolling monthly total of batches per year for Reactor 10.

Work Practice Type: PROCESS MATERIAL THRUPUT  
 Process Material: BATCHES  
 Upper Permit Limit: 1260 batches per year  
 Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE  
 Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 23: Emission Point Definition By Emission Unit**  
 Effective between the dates of 05/07/2020 and 05/06/2030

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

**Item 23.1:**

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

Emission Unit: U--DIST  
 Emission Point: EDIS1  
 Height (ft.): 24 Diameter (in.): 26  
 NYTMN (km.): 4752.099 NYTME (km.): 607.627 Building: MAIN

**Item 23.2:**

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

Emission Unit: U--ISOC  
 Emission Point: ER10S  
 Height (ft.): 29 Diameter (in.): 20  
 NYTMN (km.): 4752.136 NYTME (km.): 607.652 Building: MAIN

**Item 23.3:**

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

Emission Unit: U--POLY  
 Emission Point: ER07S  
 Height (ft.): 28 Diameter (in.): 30  
 NYTMN (km.): 4752.117 NYTME (km.): 607.683 Building: MAIN  
 Emission Point: ER07V  
 Height (ft.): 23 Diameter (in.): 2  
 NYTMN (km.): 4752.115 NYTME (km.): 607.68 Building: MAIN

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Emission Point: ER09S	Height (ft.): 28	Diameter (in.): 30	
	NYTMN (km.): 4752.103	NYTME (km.): 607.675	Building: MAIN
Emission Point: ER09V	Height (ft.): 25	Diameter (in.): 2	
	NYTMN (km.): 4752.103	NYTME (km.): 607.675	Building: MAIN
Emission Point: ER12S	Height (ft.): 28	Diameter (in.): 30	
	NYTMN (km.): 4752.117	NYTME (km.): 607.683	Building: MAIN
Emission Point: ER12V	Height (ft.): 23	Diameter (in.): 2	
	NYTMN (km.): 4752.12	NYTME (km.): 607.682	Building: MAIN
Emission Point: ER15S	Height (ft.): 27	Diameter (in.): 30	
	NYTMN (km.): 4752.1	NYTME (km.): 607.663	Building: MAIN
Emission Point: ER15V	Height (ft.): 25	Diameter (in.): 2	
	NYTMN (km.): 4752.1	NYTME (km.): 607.663	Building: MAIN
Emission Point: P100G	Height (ft.): 25	Diameter (in.): 2	
	NYTMN (km.): 4752.108	NYTME (km.): 607.641	Building: MAIN

**Condition 24: Process Definition By Emission Unit**  
**Effective between the dates of 05/07/2020 and 05/06/2030**

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

**Item 24.1:**

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

Emission Unit: U--DIST  
 Process: DIS Source Classification Code: 3-01-840-01  
 Process Description:  
 A 50 gallon distillation unit used for methylene chloride. The distillation takes 6 - 8 hours.  
 Emission Source/Control: ESDIS - Process  
 Design Capacity: 50 gallons

**Item 24.2:**

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

Emission Unit: U--ISOC  
 Process: CL2 Source Classification Code: 4-02-009-30  
 Process Description:  
 the 350 gallon reactor is cleaned by spraying methylene

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chloride. The used methylene chloride is collected and transferred into a distillation column for purification and reuse which is under a separate process ID # DIS (U-DIST).

Emission Source/Control: ESR10 - Process  
 Design Capacity: 350 gallons

**Item 24.3:**

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

Emission Unit: U--ISOC  
 Process: ISO Source Classification Code: 4-07-064-97

Process Description:

One (1) 350 gallon reactor used for the isocyanate re packing process. The reactor is fully enclosed and vacuumed to remove air, which is vented outside. Once the air is fully removed, the connection of the vacuum to the reactor is closed. With a hose, the isocyanate is pulled from the barrels into the reactor. An elephant trunk hose is used to remove odors when the isocyanate is entered into the reactor.

Emission Source/Control: ESR10 - Process  
 Design Capacity: 350 gallons

**Item 24.4:**

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

Emission Unit: U--POLY  
 Process: CL1 Source Classification Code: 3-01-009-99

Process Description:

The four (4) 1,000 gallon reactors are cleaned by spraying methylene chloride. At any given time, only a maximum of two (2) reactors may be cleaned. If the distillation process is on, then only a single reactor may be cleaned.

Emission Source/Control: ECBH1 - Control  
 Control Type: DUST COLLECTOR

Emission Source/Control: ESR07 - Process  
 Design Capacity: 1,000 gallons

Emission Source/Control: ESR09 - Process  
 Design Capacity: 1,000 gallons

Emission Source/Control: ESR12 - Process  
 Design Capacity: 1,000 gallons

Emission Source/Control: ESR15 - Process  
 Design Capacity: 1,000 gallons

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**Item 24.5:**

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

Emission Unit: U--POLY

Process: P1G

Source Classification Code: 3-01-018-18

Process Description:

One (1) 100 gallon reactor, located in the liquid resins and coating production area, is used for Polyol production. An elephant trunk hose is used to remove odors when the Polyol components are entered into the reactor. the reactor is then enclosed. the reactor will then start to mix and heat the components inside. During this step, then vacuum is turned on to remove any moisture within the reactor. the mixing and heating takes 6-8 hours, and the vacuum operates within the first 3 hours. There is no chemical reaction occurring in the reactor.

Emission Source/Control: P100G - Process

Design Capacity: 100 gallons

**Item 24.6:**

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

Emission Unit: U--POLY

Process: POL

Source Classification Code: 3-01-018-18

Process Description:

Four (4) 1,000 gallon reactors, located in the liquid resins and coating production area, are used for Polyol production. An elephant trunk hose is used to remove odors when the Polyol components are entered into the reactor. The reactor is then enclosed. the reactor will then start to mix and heat the components inside. During this step, then vacuum is turned on to remove any moisture within the reactor. The mixing and heating takes 6-8 hours, and the vacuum operates within the first 3 hours. There is no chemical reaction occurring in the reactor.

Emission Source/Control: ESR07 - Process

Design Capacity: 1,000 gallons

Emission Source/Control: ESR09 - Process

Design Capacity: 1,000 gallons

Emission Source/Control: ESR12 - Process

Design Capacity: 1,000 gallons

Emission Source/Control: ESR15 - Process

Design Capacity: 1,000 gallons

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