

Facility DEC ID: 5533200006

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 5-5332-00006/00021
Effective Date: 06/26/2023 Expiration Date: 06/25/2033

Permit Issued To: SAINT-GOBAIN PERFORMANCE PLASTICS CORPORATION
31500 Solon Road
Solon, OH 44139

Contact: Evan Rudomen
1 Sealants Park
Granville, NY 12832
(518) 345-2163

Facility: SAINT-GOBAIN PERFORMANCE PLASTICS
1 SEALANTS PARK
GRANVILLE, NY 12832-1652

Description:
St-Gobain Performance Plastics Corporation is a facility where surface coating and other exempt and trivial activities occur in the pressure sensitive tape manufacturing process. LP-Gas is used in the drying ovens, oxidizers and two boilers at the facility.

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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- 4 3 Applications for permit renewals, modifications and transfers
- 5 4 Permit modifications, suspensions or revocations by the Department

Facility Level

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

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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

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.

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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: SAINT-GOBAIN PERFORMANCE PLASTICS CORPORATION
31500 Solon Road
Solon, OH 44139

Facility: SAINT-GOBAIN PERFORMANCE PLASTICS
1 SEALANTS PARK
GRANVILLE, NY 12832-1652

Authorized Activity By Standard Industrial Classification Code:
3086 - PLASTICS FOAM PRODUCTS
3089 - PLASTICS PRODUCTS, NEC

Permit Effective Date: 06/26/2023

Permit Expiration Date: 06/25/2033

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NOTE: * preceding the condition number indicates capping.

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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 2/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

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

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

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

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial

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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 06/26/2023 and 06/25/2033

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: Facility Permissible Emissions
Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 2.1:

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: 000050-00-0 Name: FORMALDEHYDE	PTE: 19,400 pounds per year
CAS No: 000067-56-1 Name: METHYL ALCOHOL	PTE: 19,400 pounds per year
CAS No: 000068-12-2 Name: FORMAMIDE, N,N-DIMETHYL	PTE: 19,400 pounds per year
CAS No: 000080-62-6 Name: 2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER	PTE: 19,400 pounds per year
CAS No: 000100-41-4 Name: ETHYLBENZENE	PTE: 19,400 pounds per year
CAS No: 000100-42-5 Name: STYRENE	PTE: 19,400 pounds per year
CAS No: 000101-68-8 Name: METHYLENE BISPHENYL ISOCYANATE	PTE: 19,400 pounds per year
CAS No: 000107-13-1 Name: PROPENENITRILE	PTE: 19,400 pounds per year
CAS No: 000107-21-1	PTE: 19,400 pounds per year

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Name: 1,2-ETHANEDIOL

CAS No: 000108-05-4 PTE: 19,400 pounds per year
 Name: ACETIC ACID ETHENYL ESTER

CAS No: 000108-88-3 PTE: 19,400 pounds per year
 Name: TOLUENE

CAS No: 000108-90-7 PTE: 19,400 pounds per year
 Name: CHLOROBENZENE

CAS No: 000108-95-2 PTE: 19,400 pounds per year
 Name: PHENOL

CAS No: 000110-54-3 PTE: 19,400 pounds per year
 Name: HEXANE

CAS No: 000121-44-8 PTE: 19,400 pounds per year
 Name: N,N-DIETHYL ETHANAMINE

CAS No: 001309-64-4 PTE: 19,400 pounds per year
 Name: ANTIMONY TRIOXIDE

CAS No: 001330-20-7 PTE: 19,400 pounds per year
 Name: XYLENE, M, O & P MIXT.

CAS No: 0NY100-00-0 PTE: 49,000 pounds per year
 Name: TOTAL HAP

CAS No: 0NY998-00-0 PTE: 97,000 pounds per year
 Name: VOC

Condition 3: Capping Monitoring Condition
Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 3.1:

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 201-6.1 (a)
 40 CFR Part 63, Subpart JJJ

Item 3.2:

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

Item 3.3:

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

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Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2024.
 Subsequent reports are due every 12 calendar month(s).

Condition 4: Capping Monitoring Condition
Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 4.1:

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

6 NYCRR 201-6.1 (a)
 40 CFR Part 63, Subpart JJJJ

Item 4.2:

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

Item 4.3:

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

Item 4.4:

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

Item 4.5:

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

Item 4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000050-00-0	FORMALDEHYDE
CAS No: 000068-12-2	FORMAMIDE, N,N-DIMETHYL
CAS No: 000080-62-6	2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER
CAS No: 000100-41-4	ETHYLBENZENE

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CAS No: 000100-42-5	STYRENE
CAS No: 000101-68-8	METHYLENE BISPHENYL ISOCYANATE
CAS No: 000107-13-1	PROPENENITRILE
CAS No: 000107-21-1	1,2-ETHANEDIOL
CAS No: 000108-05-4	ACETIC ACID ETHENYL ESTER
CAS No: 000108-88-3	TOLUENE
CAS No: 000108-90-7	CHLOROBENZENE
CAS No: 000108-95-2	PHENOL
CAS No: 000110-54-3	HEXANE
CAS No: 000121-44-8	N,N-DIETHYL ETHANAMINE
CAS No: 001309-64-4	ANTIMONY TRIOXIDE
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 000067-56-1	METHYL ALCOHOL

Item 4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Individual HAP emissions from all facility operations will be limited to less than 9.7 tons (19,400 pounds) during all consecutive twelve (12) month periods.

Methyl Alcohol emissions from all facility operations will be limited to less than 9.7 tons (19,400 pounds) during all consecutive twelve (12) month periods. All listed individual Hazardous Air Pollutants (HAPs) emission are being limited by limiting Methyl Alcohol's emission.

Saint-Gobain Plastics Performance must submit to the Regional Office of the Department, an annual all individual HAPs emission report which certifies that the facility has been operated within the limits imposed by the emission cap. The annual report must be submitted by January 30th for the previous calendar year.

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.

Parameter Monitored: METHYL ALCOHOL

Upper Permit Limit: 19400 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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The initial report is due 1/30/2024.
 Subsequent reports are due every 12 calendar month(s).

Condition 5: Capping Monitoring Condition
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Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 5.1:

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

6 NYCRR 201-6.1 (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: 0NY998-00-0 VOC

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:

Total volatile Organic Compound (VOC) emissions from all facility operations will be limited to less than 48.5 tons (97,000 pounds) during all consecutive twelve (12) month periods. Monthly inventories will be conducted to determine chemical usage on a twelve (12) month rolling basis. The record keeping form will be updated as products are added or deleted.

Saint-Gobain Plastics Performance must submit to the Regional Office of the Department, an annual Total VOCs emission report which certifies that the facility has been operated within the limits imposed by the emission cap. The annual report must be submitted by January 30th for the previous calendar year.

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.

Parameter Monitored: VOC

Upper Permit Limit: 97000 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 1/30/2024.

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

Condition 6: Visible Emissions Limited
Effective between the dates of 06/26/2023 and 06/25/2033

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: Maintain all process emission sources, including the associated air pollution control and monitoring equipment
Effective between the dates of 06/26/2023 and 06/25/2033

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

Item 7.1:

This Condition applies to:

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Emission Unit: FINISH

Emission Unit: OTHERS

Item 7.2:

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 8: Compliance Demonstration
Effective between the dates of 06/26/2023 and 06/25/2033

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

Item 8.1:

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

- | | |
|------------------------|-----------------------|
| Emission Unit: M-IXING | Emission Point: 06002 |
| Emission Unit: O-THERS | Emission Point: OT001 |
| Emission Unit: O-THERS | Emission Point: OT002 |

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

Item 8.2:

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:

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

Parameter Monitored: PARTICULATES
 Upper Permit Limit: 0.050 grains per dscf
 Reference Test Method: EPA Method 5
 Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Averaging Method: Arithmetic average of stack test runs

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 9: Compliance Demonstration
 Effective between the dates of 06/26/2023 and 06/25/2033

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

Item 9.1:

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

Emission Unit: F-INISH

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

Item 9.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). Observations must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

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

Records of these observations, investigations and

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: Compliance Demonstration
Effective between the dates of 06/26/2023 and 06/25/2033

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

Item 10.1:

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

Emission Unit: F-INISH	Emission Point: 01002
Emission Unit: F-INISH	Emission Point: 03006
Emission Unit: F-INISH	Emission Point: 04001

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

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Except as provided for in Paragraph (2) of this condition, the owner or operator of any emission source subject to Subpart 228-1 must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

used to determine the actual VOC content of each as applied coating used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the department and, upon request, these records must be submitted to the department within 90 days of receiving the request. Any facility required to perform the overall removal efficiency calculation set forth in Equation 2 of Subsection 228-1.5(c), must maintain records to verify the parameters used in the calculation. A facility owner or operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 90 percent. Any additional information required to determine compliance with Subpart 228-1 must be provided to the department in a format acceptable to the department. All records required by this paragraph must be maintained at the facility for a period of five years.

(2) Owners and operators of emission sources not subject to Subpart 228-1 as set forth in Subpart 228-1.1(b)(9) or (13), or those sources that are using coatings not subject to specific requirements of Subpart 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 11: Surface Coating- Prohibitions
Effective between the dates of 06/26/2023 and 06/25/2033

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

Item 11.1:

(1) No person shall sell, supply, offer for sale, solicit, use, specify, or require for use, the application of a coating on a part or product at a facility with a coating line described in Subpart 228-1.1(a) if such sale, specification, or use is prohibited by any of the provisions of this Subpart. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at an affected facility. This prohibition shall not apply to the following:

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(i) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in the tables of Subpart 228-1.4;

(ii) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in Subpart 228-1.5(d); and

(iii) coatings utilized at surface coating lines that have been granted variances pursuant to Subpart 228-1.5(e).

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

Condition 12: Compliance Demonstration
Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement: 6 NYCRR 228-1.4 (d) (3)

Item 12.1:

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

Emission Unit: F-INISH	Emission Point: 01002
Emission Unit: F-INISH	Emission Point: 03006
Emission Unit: F-INISH	Emission Point: 04001
Regulated Contaminant(s):	
CAS No: 0NY998-00-0	VOC

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coating categories for Pressure sensitive tape and label surface coating lines may contain a maximum of 0.067 pounds of VOC per pound of coating as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 0.067 kilograms VOC per kilogram as applied

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Compliance Demonstration

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Facility DEC ID: 5533200006

Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement:6 NYCRR 228-1.6 (f) (1)

Item 13.1:

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

Emission Unit: F-INISH

Emission Point: U0003

Item 13.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

If an incinerator is used as an air cleaning device, a continuous monitor for exhaust gas temperature must be installed, periodically calibrated, and operated when the control equipment is operating. When temperatures fall below the approved performance test combustion temperature; immediate action must be taken to restore control equipment to its proper operating temperature.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1548 degrees F below the approved
performance test combustion
temperature

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2024.

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

Condition 14: Compliance Demonstration

Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement:6 NYCRR 228-1.6 (f) (1)

Item 14.1:

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

Emission Unit: F-INISH

Emission Point: U0002

Item 14.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

If an incinerator is used as an air cleaning device, a continuous monitor for exhaust gas temperature must be installed, periodically calibrated, and operated when the control equipment is operating. When temperatures fall below the approved performance test combustion temperature; immediate action must be taken to restore control equipment to its proper operating temperature.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1476 degrees F below the approved performance test combustion temperature

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2024.

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

Condition 15: Compliance Demonstration

Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement: 40CFR 60.443(e), NSPS Subpart RR

Item 15.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: F-INISH

Emission Point: U0003

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 15.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Will monitor control device temperature and maintain a minimum temperature of 50 degrees F below that of the most recent stack test.

Compliance with this requirement also demonstrates compliance with the control requirements of 6 NYCRR 228-1.3.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1548 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 12 calendar month(s).

Condition 16: Compliance Demonstration
Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement:40CFR 60.443(e), NSPS Subpart RR

Item 16.1:

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

Emission Unit: F-INISH Emission Point: U0002

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

Item 16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Will monitor control device temperature and maintain a minimum temperature of 50 degrees F below that of the most recent stack test.

Compliance with this requirement also demonstrates compliance with the control requirements of 6 NYCRR 228-1.3.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 1476 degrees Fahrenheit
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR ROLLING AVERAGE
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2024.
Subsequent reports are due every 12 calendar month(s).

Condition 17: Compliance Demonstration
Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement:40CFR 60.445(h), NSPS Subpart RR

Item 17.1:

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

Emission Unit: F-INISH
Process: 40A

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Emission Unit: F-INISH
Process: 40B

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

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Records of measurements required in 60.443 and 60.445 must be retained for at least two years following the date of the measurements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 18: Surface Coating - Handling, storage and disposal
Effective between the dates of 06/26/2023 and 06/25/2033

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

Item 18.1:

This Condition applies to Emission Unit: F-INISH

Item 18.2:

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;

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

- (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 19: Compliance Demonstration
Effective between the dates of 06/26/2023 and 06/25/2033

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

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: F-INISH

Item 19.2:

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 20: Compliance Demonstration
Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement: 40CFR 60.445(g), NSPS Subpart RR

Item 20.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Emission Unit: F-INISH
Process: 40A

Emission Unit: F-INISH
Process: 40B

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

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If an affected facility that is controlled by a solvent destruction device uses a hood or enclosure system to capture fugitive VOC emissions, a monitoring device shall be installed, calibrated, maintained, and operated to continuously indicate that the hood or enclosure system is operating.

No continuous monitor is required if it is demonstrated that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system.

All records shall be retained for at least two years following the date of the measurements.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration
Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement:40CFR 60.440(b), NSPS Subpart RR

Item 21.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: F-INISH
Process: 40A

Emission Unit: F-INISH
Process: 40B

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Any affected facility which inputs to the coating process 45 Mg of VOC or less per 12 month period is not subject to the emission limits of 40 CFR Part 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60 Subpart RR. If the amount of VOC input exceeds 45 Mg per 12 month period, the coating line will become subject to 40 CFR Part 60.442(a) and all other sections of 40 CFR Part 60 Subpart RR.

Monitoring Frequency: MONTHLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2024.
 Subsequent reports are due every 12 calendar month(s).

Condition 22: Compliance Demonstration
Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement:40CFR 60.445(a), NSPS Subpart RR

Item 22.1:

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

Emission Unit: F-INISH
 Process: 40A

Emission Unit: F-INISH
 Process: 40B

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

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility subject to this subpart shall maintain a calendar month record of all coatings used and the results of the reference test method specified in 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.

Monitoring Frequency: MONTHLY
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 23: Compliance Demonstration
Effective between the dates of 06/26/2023 and 06/25/2033

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Facility DEC ID: 5533200006

Applicable Federal Requirement:40CFR 60.445(e), NSPS Subpart RR

Item 23.1:

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

Emission Unit: F-INISH
Process: 40A

Emission Unit: F-INISH
Process: 40B

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

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility controlled by a thermal incineration solvent destruction device shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases. The monitoring device shall have an accuracy of the greater of (+) or (-) 0.75 percent of the temperature being measured expressed in degrees Celsius or (+) or (-) 2.5 degrees Celsius.

All records shall be retained for at least two years following the date of the measurements.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 24: Compliance Demonstration

Effective between the dates of 06/26/2023 and 06/25/2033

Applicable Federal Requirement:40CFR 60.445(d), NSPS Subpart RR

Item 24.1:

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

Emission Unit: F-INISH
Process: 40A

Emission Unit: F-INISH
Process: 40B

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Facility DEC ID: 5533200006

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility operating at the conditions specified in 40 CFR 60.440(b) shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2024.

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

Condition 25: Compliance Demonstration

Effective between the dates of 06/26/2023 and 06/25/2033

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

Item 25.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: M-IXING

Emission Unit: O-THERS

Item 25.2:

Compliance Demonstration shall include the following monitoring:

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

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

(2) the equipment at the facility was being properly operated and maintained;

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

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

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

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

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

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

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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 26: Contaminant List

Effective between the dates of 06/26/2023 and 06/25/2033

Applicable State Requirement:ECL 19-0301

Item 26.1:

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

CAS No: 000050-00-0
 Name: FORMALDEHYDE

CAS No: 000067-56-1
 Name: METHYL ALCOHOL

CAS No: 000068-12-2
 Name: FORMAMIDE, N,N-DIMETHYL

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CAS No: 000080-62-6
Name: 2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER

CAS No: 000100-41-4
Name: ETHYLBENZENE

CAS No: 000100-42-5
Name: STYRENE

CAS No: 000101-68-8
Name: METHYLENE BISPHENYL ISOCYANATE

CAS No: 000107-13-1
Name: PROPENENITRILE

CAS No: 000107-21-1
Name: 1,2-ETHANEDIOL

CAS No: 000108-05-4
Name: ACETIC ACID ETHENYL ESTER

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 000108-90-7
Name: CHLOROBENZENE

CAS No: 000108-95-2
Name: PHENOL

CAS No: 000110-54-3
Name: HEXANE

CAS No: 000121-44-8
Name: N,N-DIETHYL ETHANAMINE

CAS No: 001309-64-4
Name: ANTIMONY TRIOXIDE

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

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

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

CAS No: 0NY998-00-0
Name: VOC

Condition 27: Malfunctions and Start-up/Shutdown Activities

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Effective between the dates of 06/26/2023 and 06/25/2033

Applicable State Requirement:6 NYCRR 201-1.4**Item 27.1:**

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

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

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

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

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

Condition 28: Emission Unit Definition

Effective between the dates of 06/26/2023 and 06/25/2033

Applicable State Requirement:6 NYCRR Subpart 201-5**Item 28.1:**

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

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Emission Unit: F-INISH

Emission Unit Description:

Emission unit F-INISH consists of various surface coating operations which are performed at the facility. The emission unit consists of six (6) processes (20A, 20B, 30A, 30B, 40A and 40B), five (5) emission points (01002, 03006, 04001, U0002 and U0003), twenty one (21) emission sources (201-210, 301-306 and 401-405), and two (2) emission control device (00002 and 00003). Operation of each line while using solvent based coatings will be exhausted to Emission Point U0002 (Reeco Oxidizer RL35) or Emission Point U0003 (Durr Oxidizer RL15) .

Building(s): 2
3

Item 28.2:

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

Emission Unit: M-IXING

Emission Unit Description:

Emission unit M-IXING consists of various operations associated with mixing and blending of plastisols. The emission unit consists of one (1) process (60A), one (1) emission point (06002), five (5) emission sources (00601-00605), & one (1) emission control device (00606).

Building(s): 1

Item 28.3:

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

Emission Unit: O-THERS

Emission Unit Description:

Emission unit O-THERS consists of a process which utilizes various VOC containing compounds, including MDI in a production process known as "Green Glue". The Emission unit consists of one (1) process (OT1), two (2) emission points (OT001-OT002), two (2) emission sources (OT1-OT2), and no emission control devices.

Building(s): 1

**Condition 29: Renewal deadlines for state facility permits
Effective between the dates of 06/26/2023 and 06/25/2033**

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

Item 29.1:

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.

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Condition 30: CLCPA Applicability

Effective between the dates of 06/26/2023 and 06/25/2033

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

Item 30.1:

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 31: Compliance Demonstration

Effective between the dates of 06/26/2023 and 06/25/2033

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

Item 31.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 31.2:

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: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 32: Air pollution prohibited

Effective between the dates of 06/26/2023 and 06/25/2033

Applicable State Requirement:6 NYCRR 211.1

Item 32.1:

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.

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 35.1:

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

Emission Unit: F-INISH			
Emission Point: 01002			
Height (ft.): 29	Diameter (in.): 21		
NYTMN (km.): 4806.5	NYTME (km.): 641.4	Building: 2	
Emission Point: 03006			
Height (ft.): 31	Diameter (in.): 22		
NYTMN (km.): 4806.5	NYTME (km.): 641.4	Building: 3	
Emission Point: 04001			
Height (ft.): 31	Length (in.): 30	Width (in.): 20	
NYTMN (km.): 4806.5	NYTME (km.): 641.4	Building: 2	
Emission Point: U0002			
Height (ft.): 50	Diameter (in.): 52		
NYTMN (km.): 4806.5	NYTME (km.): 641.4	Building: 2	
Emission Point: U0003			
Height (ft.): 35	Length (in.): 53	Width (in.): 30	
NYTMN (km.): 4806.5	NYTME (km.): 641.4	Building: 2	

Item 35.2:

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

Emission Unit: M-IXING			
Emission Point: 06002			
Height (ft.): 21	Diameter (in.): 20		
NYTMN (km.): 4806.51	NYTME (km.): 641.5	Building: 1	

Item 35.3:

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

Emission Unit: O-THERS			
Emission Point: OT001			
Height (ft.): 13	Diameter (in.): 6		
NYTMN (km.): 4806.527	NYTME (km.): 641.405	Building: 1	
Emission Point: OT002			
Height (ft.): 30	Diameter (in.): 6		
NYTMN (km.): 4806.526	NYTME (km.): 641.411	Building: 1	

Condition 36: Process Definition By Emission Unit
Effective between the dates of 06/26/2023 and 06/25/2033

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Emission Source/Control: 00204 - Process

Emission Source/Control: 00205 - Process

Emission Source/Control: 00206 - Process

Emission Source/Control: 00207 - Process

Emission Source/Control: 00208 - Process

Emission Source/Control: 00209 - Process

Emission Source/Control: 00210 - Process

Item 36.3:

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

Emission Unit: F-INISH

Process: 30A

Source Classification Code: 4-02-001-10

Process Description:

PRESSURE SENSITIVE TAPE COATING LINE 3
USING SOLVENT BASED COATINGS.

Emission Source/Control: 00002 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 00008 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 00301 - Process

Emission Source/Control: 00302 - Process

Emission Source/Control: 00303 - Process

Emission Source/Control: 00304 - Process

Emission Source/Control: 00305 - Process

Emission Source/Control: 00306 - Process

Item 36.4:

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

Emission Unit: F-INISH

Process: 30B

Source Classification Code: 4-02-022-11

Process Description:

PRESSURE SENSITIVE TAPE COATING LINE 3
USING WATER BASED COATINGS.

Emission Source/Control: 00301 - Process

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Emission Source/Control: 00302 - Process

Emission Source/Control: 00303 - Process

Emission Source/Control: 00304 - Process

Emission Source/Control: 00305 - Process

Emission Source/Control: 00306 - Process

Item 36.5:

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

Emission Unit: F-INISH

Process: 40A

Source Classification Code: 4-02-001-10

Process Description:

PRESSURE SENSITIVE TAPE COATING LINE 4
USING SOLVENT BASED COATINGS.

Emission Source/Control: 00002 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 00008 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 00401 - Process

Emission Source/Control: 00402 - Process

Emission Source/Control: 00403 - Process

Emission Source/Control: 00404 - Process

Emission Source/Control: 00405 - Process

Item 36.6:

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

Emission Unit: F-INISH

Process: 40B

Source Classification Code: 4-02-022-11

Process Description:

PRESSURE SENSITIVE TAPE COATING LINE 4
USING WATER BASED COATINGS.

Emission Source/Control: 00401 - Process

Emission Source/Control: 00402 - Process

Emission Source/Control: 00403 - Process

Emission Source/Control: 00404 - Process

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006

Emission Source/Control: 00405 - Process

Item 36.7:

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

Emission Unit: M-IXING

Process: 60A

Source Classification Code: 4-02-022-03

Process Description:

VARIOUS MIXING AND BLENDING OPERATIONS IN THE PREPARATION OF PLASTISOLS.

Emission Source/Control: 00606 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00601 - Process

Emission Source/Control: 00602 - Process

Emission Source/Control: 00603 - Process

Emission Source/Control: 00604 - Process

Emission Source/Control: 00605 - Process

Item 36.8:

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

Emission Unit: O-THERS

Process: OT1

Source Classification Code: 4-02-007-06

Process Description:

A process which utilizes various VOC containing compounds, including MDI in a production process known as "Green Glue".

Emission Source/Control: OTHR1 - Process

Emission Source/Control: OTHR2 - Process

Permit ID: 5-5332-00006/00021

Facility DEC ID: 5533200006