



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-2136-00064/00001
Effective Date: 07/20/2015 Expiration Date: 07/19/2025

Permit Issued To: FLOCAST LLC
15 S SECOND ST
DOLGEVILLE, NY 13329

Contact: EDWARD MORSE
15 SOUTH SECOND STREET
DOLGEVILLE, NY 13329
(315) 429-8407

Facility: BERGERON BY DESIGN
15 S SECOND ST
DOLGEVILLE, NY 13329

Description:
This State Facility Permit renewal is primarily being performed in order to create a ten-year expiration date for this permit.

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: LAWRENCE R AMBEAU
NYSDEC - REGION 6
317 WASHINGTON ST
WATERTOWN, NY 13601

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA



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 expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

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



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

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 6
SUBOFFICE - UTICA
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 6 Sub-office
Division of Environmental Permits
State Office Building, 207 Genesee Street
Utica, NY 13501-2885
(315) 793-2555

New York State Department of Environmental Conservation

Permit ID: 6-2136-00064/00001

Facility DEC ID: 6213600064



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To:FLOCAST LLC
15 S SECOND ST
DOLGEVILLE, NY 13329

Facility: BERGERON BY DESIGN
15 S SECOND ST
DOLGEVILLE, NY 13329

Authorized Activity By Standard Industrial Classification Code:
3061 - MECHANICAL RUBBER GOODS
3086 - PLASTICS FOAM PRODUCTS
3089 - PLASTICS PRODUCTS, NEC
5162 - PLASTICS MATERIALS AND BASIC SHAPES

Permit Effective Date: 07/20/2015

Permit Expiration Date: 07/19/2025



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-3.2 (c) (12): Graphic Arts Exemption
- 2 6 NYCRR 201-3.2 (c) (17): Surface Coating Exemption
- 3 6 NYCRR 211.1: Air pollution prohibited
- 4 6 NYCRR 212.4 (c): Compliance Demonstration
- 5 6 NYCRR 212.6 (a): Compliance Demonstration

Emission Unit Level

EU=1-SPTOM,Proc=200

- 6 40CFR 63.11416(c), Subpart OOOOOO: Compliance Demonstration
- 7 40CFR 63.11417(d), Subpart OOOOOO: Timeframes for maintaining records for molded, rebond or flexible polyurethane foam fabrication containing a loop slitter

EU=1-SPTOM,Proc=400

- 8 40CFR 63.11416(e), Subpart OOOOOO: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 9 ECL 19-0301: Contaminant List
- 10 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 11 6 NYCRR Subpart 201-5: Emission Unit Definition
- 12 6 NYCRR 201-5.1 (a): Compliance Demonstration
- 13 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 14 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 15 6 NYCRR 211.2: Visible Emissions Limited
- 16 6 NYCRR 211.2: Compliance Demonstration

Emission Unit Level

- 17 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 18 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;
- (3) During the period of the emergency the facility owner and/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 and/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 and/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 F: 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 G: 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 H: 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 I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Graphic Arts Exemption



Effective between the dates of 07/20/2015 and 07/19/2025

Applicable Federal Requirement:6 NYCRR 201-3.2 (c) (12)

Item 1.1:

The following activities are exempt from permitting requirements at non-title V facilities, but must be included in title V facility permit applications:
Screen printing inks/coatings or adhesives which are applied by a hand-held squeegee. A hand-held squeegee is one that is not propelled through the use of mechanical conveyance and is not an integral part of the screen printing process.

Condition 2: Surface Coating Exemption
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable Federal Requirement:6 NYCRR 201-3.2 (c) (17)

Item 2.1:

The following activity is exempt from permitting requirements, but must be included in the Title V permit application: Surface coating and related activities at facilities which uses less than 25 gallons per month of total coating materials. Coating materials include all paints and paint components, other materials mixed with paints prior to application, and cleaning solvents, combined, subject to the following:
(i) the facility is located outside of the New York City metropolitan area or the Orange County towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, or Woodbury; and
(ii) all abrasive cleaning and surface coating operations are performed in an enclosed building where such operations are exhausted into appropriate emission control devices.

Condition 3: Air pollution prohibited
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable Federal Requirement:6 NYCRR 211.1

Item 3.1:

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 4: Compliance Demonstration
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 4.1:

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

New York State Department of Environmental Conservation

Permit ID: 6-2136-00064/00001

Facility DEC ID: 6213600064



Emission Unit: 1-SPTOM Emission Point: 00001

Emission Unit: 1-SPTOM Emission Point: 00002

Emission Unit: 1-SPTOM Emission Point: 00003

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

Item 4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particles are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions and on a dry gas basis.

Performance testing (EPA RM 5) is the only true method to prove compliance with this standard and shall be conducted at the discretion of the Department.

In the absence of a formal stack test, facility shall attest to compliance by (once per week, while that source is operating) visually monitoring and recording the exhaust plume from each involved emission point. These observations shall be recorded in a log book which shall be submitted annually and shall be retained for a five year period.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.05 grains per cubic foot
Reference Test Method: EPA Reference Methods 1 thru 5
Monitoring Frequency: WEEKLY
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 5: Compliance Demonstration
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable Federal Requirement: 6 NYCRR 212.6 (a)

Item 5.1:

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

New York State Department of Environmental Conservation

Permit ID: 6-2136-00064/00001

Facility DEC ID: 6213600064



Emission Unit: 1-SPTOM Emission Point: 00001
Emission Unit: 1-SPTOM Emission Point: 00002
Emission Unit: 1-SPTOM Emission Point: 00003
Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 5.2:

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 to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any process emission source subject to 6 NYCRR 201.

EPA Reference Method 9 is the only formal determinate of opacity compliance and the Department reserves the right to perform or require the performance of a RM9.

In the absence of a formal RM 9, facility shall attest to opacity compliance by visually monitoring and recording the magnitude of optical density of the exhaust plume from each referenced emission point. This observation shall be made once per week and while the source is operating. The observer shall not consider that portion of the plume that is water vapor. These observations shall be recorded in a log book which shall be submitted annually and shall be retained for a five year period.

If dense emissions (any that are greater than "clear" or "very minimal") are observed for two consecutive days, then facility shall:

- 1) Immediately investigate the root cause and take appropriate corrective action.
- 2) Conduct a certified EPA Reference Method 9 visible emission test
- 3) Notify the NYSDEC, Division of Air Resources, Region 6
- 4) If the Method 9 test determines that the opacity is less than 20%, then an appropriate log entry of "very minimal" shall be recorded.
- 5) If the RM9 certified observer detects opacity greater than 20%, then facility shall make such an entry in the log.

Parameter Monitored: OPACITY

New York State Department of Environmental Conservation

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Upper Permit Limit: 20 percent
Reference Test Method: Observe plume daily, do RM9 upon NYSDEC request
Monitoring Frequency: WEEKLY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

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

Condition 6: Compliance Demonstration
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable Federal Requirement: 40CFR 63.11416(c), Subpart
OOOOOO

Item 6.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SPTOM
Process: 200

Item 6.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Owners or operators of a new or existing molded foam affected source must comply with the following requirements:

(1) Material containing methylene chloride must not be used as an equipment cleaner to flush the mixhead or used elsewhere as an equipment cleaner in a molded flexible polyurethane foam process.

(2) Mold release agent containing methylene chloride must not be used in a molded flexible polyurethane foam process.

The owner or operator may demonstrate compliance with the above requirement using adhesive usage records, Material Safety Data Sheets, and engineering calculations.

Monitoring Frequency: CONTINUOUS
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).



Condition 7: Timeframes for maintaining records for molded, rebond or flexible polyurethane foam fabrication containing a loop slitter

Effective between the dates of 07/20/2015 and 07/19/2025

Applicable Federal Requirement:40CFR 63.11417(d), Subpart

OOOOOO

Item 7.1:

This Condition applies to Emission Unit: 1-SPTOM
Process: 200

Item 7.2:

Owners and/or operators of molded foam affected sources, rebond foam affected sources, and flexible polyurethane foam fabrication affected sources containing a loop slitter, must maintain records of the information used to demonstrate compliance, as required in §63.11416(f). The records must be maintained for 5 years, with the last 2 years of data retained on site. The remaining 3 years of data may be maintained off site

Condition 8: Compliance Demonstration

Effective between the dates of 07/20/2015 and 07/19/2025

Applicable Federal Requirement:40CFR 63.11416(e), Subpart

OOOOOO

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SPTOM
Process: 400

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators of a new or existing flexible polyurethane foam fabrication affected source must not use any adhesive containing methylene chloride in a flexible polyurethane foam fabrication process. Compliance may be demonstrated by using adhesive usage records, Material Safety Data Sheets, and engineering calculations.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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





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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all 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 9: Contaminant List
Effective between the dates of 07/20/2015 and 07/19/2025



Applicable State Requirement:ECL 19-0301

Item 9.1:

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

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

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

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

Condition 10: Malfunctions and start-up/shutdown activities
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable State Requirement:6 NYCRR 201-1.4

Item 10.1:

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

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

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

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

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(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 11: Emission Unit Definition
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 11.1:

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

Emission Unit: 1-SPTOM

Emission Unit Description:

This emission unit consists of all manufacturing operations at this facility. Molded polyurethane foam items are produced by some or all of the following operations: 1) Solid elastomeric urethane 2) Flexible polyurethane foam 3) Rigid polyurethane foam 4) Assembly of the finished part - including gluing, fasteners, labeling, stay/fixture installation.

40 CFR 63-000000 applies: Facility is a "molded foam source" and is a "fabrication source".

Building(s): 1

Condition 12: Compliance Demonstration
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable State Requirement:6 NYCRR 201-5.1 (a)

Item 12.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-SPTOM

Process: 100

Emission Unit: 1-SPTOM

Process: 200

Emission Unit: 1-SPTOM

Process: 300

Emission Unit: 1-SPTOM

Process: 400

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

CAS No: 0NY998-00-0 VOC



Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall monitor, record and report the volume usage of VOC and HAP containing reactants, coatings, inks, solvents, adhesives, etc. VOC and HAP emissions shall be calculated. Records shall be calculated on a 12-month rolling total basis. This spreadsheet shall be submitted to NYSDEC in each Annual Monitoring Report. Purpose of the spreadsheet submission is to verify ongoing compliance with annual potential to emit (PTE) thresholds for VOC and HAP. This permit is a "Natural Minor" and is therefore predicated upon the following PTEs: VOC<50 ton/yr, aggregated HAP<25 ton/yr, speciated HAP<10 ton/yr.

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 1/30/2016.

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

Condition 13: Renewal deadlines for state facility permits
Effective between the dates of 07/20/2015 and 07/19/2025

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

Item 13.1:

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 14: Compliance Demonstration
Effective between the dates of 07/20/2015 and 07/19/2025

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

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

New York State Department of Environmental Conservation

Permit ID: 6-2136-00064/00001

Facility DEC ID: 6213600064



Division of Air Resources
NYS Dept. of Environmental Conservation
Region 6
State Office Building
317 Washington Ave.
Watertown, NY 13601

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

Condition 15: Visible Emissions Limited
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable State Requirement:6 NYCRR 211.2

Item 15.1:

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 16: Compliance Demonstration
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable State Requirement:6 NYCRR 211.2

Item 16.1:

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

Emission Unit: 1-SPTOM

Regulated Contaminant(s):

CAS No: 0NY075-00-0	PARTICULATES
CAS No: 0NY100-00-0	TOTAL HAP
CAS No: 0NY998-00-0	VOC

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:

1. Have a complaint phone line available 24 hours a day,



- 7 days a week; the employment of an answering machine is acceptable.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and action taken.
5. Annually, report in a format acceptable to the Department. Facility shall report the number of complaints (even if zero) that have been logged throughout the reporting period.

Monitoring Frequency: DAILY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due every 12 calendar month(s).

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

Condition 17: Emission Point Definition By Emission Unit
Effective between the dates of 07/20/2015 and 07/19/2025

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1:

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

Emission Unit: 1-SPTOM

Emission Point: 00001

Height (ft.): 54 Diameter (in.): 10
NYTMN (km.): 4771.469 NYTME (km.): 518.755 Building: 1

Emission Point: 00002

Height (ft.): 53 Diameter (in.): 18
NYTMN (km.): 4771.469 NYTME (km.): 518.755 Building: 1

Emission Point: 00003

Height (ft.): 30 Diameter (in.): 18
NYTMN (km.): 4771.478 NYTME (km.): 518.76 Building: 1

Emission Point: 00004

Height (ft.): 30 Diameter (in.): 18
NYTMN (km.): 4771.478 NYTME (km.): 518.76 Building: 1

Condition 18: Process Definition By Emission Unit
Effective between the dates of 07/20/2015 and 07/19/2025



Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1:

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

Emission Unit: 1-SPTOM

Process: 100

Source Classification Code: 3-08-010-05

Process Description:

This process consists of the formation of "solid elastomeric polyurethane" (an isocyanate and polyol mix). Mold is prepped with the application of a mold release agent, which is sprayed on in a spray booth (Source = "WAXER" & EP = 00002). Solid elastomeric urethane is applied. Mixhead is flushed without the usage of methylene chloride. This process generates MDI (a VOC and a HAP) emissions. DEC staff may find additional detail (confidential) in the "Application Identification Information" description field.

Emission Source/Control: SKINN - Process

Emission Source/Control: WAXER - Process

Item 18.2:

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

Emission Unit: 1-SPTOM

Process: 200

Source Classification Code: 3-08-010-05

Process Description:

This process consists of the formation of "flexible polyurethane foam" (an isocyanate and polyol mix) into split-molds. This foam generates MDI (VOC & HAP) emissions. Mixhead is flushed with water, not to include methylene chloride. It is this process that makes 40 CFR 63-00000 applicable to Flocast, LLC. DEC staff may find additional detail (confidential) in the "Application Identification Information" description field.

Emission Source/Control: FLEXX - Process

Item 18.3:

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

Emission Unit: 1-SPTOM

Process: 300

Source Classification Code: 3-08-010-05

Process Description:

This process consists of the formation of "rigid polyurethane foam". Rigid polyurethane foam is produced from isocyanate and polyol which is mixed by hand and then poured from cups; so no mixhead exists and therefore no mixhead-flushing can occur. This process generates MDI (a VOC & a HAP) emissions. DEC staff may find additional

New York State Department of Environmental Conservation

Permit ID: 6-2136-00064/00001

Facility DEC ID: 6213600064



detail (confidential) in the "Application Identification Information" description field.

Emission Source/Control: RIGID - Process

Item 18.4:

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

Emission Unit: 1-SPTOM

Process: 400

Source Classification Code: 4-90-999-98

Process Description:

This process consists of various final assembly operations, which include bolting, screwing, gluing and silkscreen printing (printing part numbers and company logos). Silkscreening is manually-applied and exempt per 201-3.2(c)(12). An adhesive is activated with solvent. This process also includes minimal spray-painting in the pattern shop spray booth (Source = "PATRN" & EP = 00003), an operation that is exempt due to coating usage at less than 25 gal/month usage. DEC staff may find additional detail (confidential) in the "Application Identification Information" description field.

Emission Source/Control: PATRN - Process

Emission Source/Control: PTRN2 - Process

