

## PERMIT Under the Environmental Conservation Law (ECL)

## **IDENTIFICATION INFORMATION**

	State Facility 12-00017/00025 ctive Date:	Expiration Date:	
10-	ONEIDA MOLDED PLASTICS 4 S WARNER ST NEIDA, NY 13421	LLC	
ON 10	ICHAEL F BECKETT NEIDA MOLDED PLASTICS L 4 S WARNER ST NEIDA, NY 13421	LC	
10-	NEIDA MOLDED PLASTICS L 4 S WARNER ST NEIDA, NY 13421	LC	
Description:			
Oneida Molded Plastics, LLC is a full-service plastic custom injection molding manufacturer including decorative and assembly capabilities. The facilty proposes to install a new robotic paint booth (Paint Booth No. 8) to apply primarily a base coat, but also may periodically apply a clear top coat to plastic parts. Based on air diespersion modeling conducted, the facility will not exceed any air pollutants AGC/SGC concentrations with the addition of the robotic paint booth. See attached modeling results included with this application.			
compliance with the		hat the permit is contingent upon strict s, the General Conditions specified and any	
Permit Administra	tor: KEVIN M BALDU NYSDEC - REGIO 5786 Widewaters P SYRACUSE, NY 1	N 7 kwy	
Authorized Signati	ure:	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.



## PAGE LOCATION OF CONDITIONS

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## **DEC GENERAL CONDITIONS**

## **General Provisions**

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- 4 2 Relationship of this Permit to Other Department Orders and Determinations
- 4 3 Applications for permit renewals, modifications and transfers
- 5 4 Permit modifications, suspensions or revocations by the Department Facility Level
- 5 Submission of application for permit modification or renewal-REGION 7 HEADQUARTERS



# 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.

### Item3.2:

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.

#### **Division of Air Resources**



Facility DEC ID: 7251200017

## 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 7
HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

## Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator Region 7 Headquarters Division of Environmental Permits 5786 Widewaters Parkway Syracuse, NY 13214-1867 (315) 426-7400



## Permit Under the Environmental Conservation Law (ECL)

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

## IDENTIFICATION INFORMATION

Permit Issued To:ONEIDA MOLDED PLASTICS LLC 104 S WARNER ST ONEIDA, NY 13421

Facility: ONEIDA MOLDED PLASTICS LLC

104 S WARNER ST ONEIDA, NY 13421

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

Permit Effective Date: Permit Expiration Date:



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NOTE: \* preceding the condition number indicates capping.



## FEDERALLY ENFORCEABLE CONDITIONS

DRAFT \*\*\*\* 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

- (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



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

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

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

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

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

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

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

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

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



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

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

Condition 1: Facility Permissible Emissions
Effective for entire length of Permit

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

#### Item 1.1:

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: 0NY998-00-0 PTE: 24,000 pounds per year

Name: VOC

Condition 2: Capping Monitoring Condition

Effective for entire length of Permit

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

### Item 2.1:

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 228-1.5 (e)

## Item 2.2:

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

#### Item 2.3:

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



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other state and federal air pollution control requirements, regulations or law.

#### Item 2.4:

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 2.5:

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 2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

#### Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

The facility will not emit VOC emissions greater than 12.0 tons/yr on a 12 month rolling basis. Compliance with this limit will be demonstrated by calculating monthly and 12 month rolling VOC emissions utilizing methods acceptable to the Department, including but not limited to production usage data, coating data for VOC containing processes, and/or emission factors.

Parameter Monitored: VOC CONTENT Upper Permit Limit: 12.0 tons per year Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

## Condition 3: Visible Emissions Limited Effective for entire length of Permit

## Applicable Federal Requirement: 6 NYCRR 211.2

## Item 3.1:

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



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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 4: Once in always in

**Effective for entire length of Permit** 

## Applicable Federal Requirement: 6 NYCRR 228-1.1 (a) (3)

#### Item 4.1:

Any coating line that is or becomes subject to the provisions of Subpart 228-1 will remain subject to these provisions even if the annual potential to emit or actual emissions of VOCs for the facility later falls below the thresholds set forth in Subdivision 228-1.1(a).

## Condition 5: Compliance Demonstration Effective for entire length of Permit

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

## Item 5.1:

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

Emission Unit: 1-PAINT Emission Point: 00005

Process: 001

Emission Unit: 1-PAINT Emission Point: 00006

Process: 001

Emission Unit: 1-PAINT Emission Point: 00007

Process: 001

Emission Unit: 1-PAINT Emission Point: 00008

Process: 001

Emission Unit: 1-PAINT Emission Point: 00009

Process: 001

Emission Unit: 1-PAINT Emission Point: 00010

Process: 001

Emission Unit: 1-PAINT Emission Point: 00011

Process: 001

Emission Unit: 1-PAINT Emission Point: 00012

Process: 001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES



#### Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

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

The facility owner or operator shall conduct a visible emissions observation of all emission points specified by this condition once per day while the process is in operation. The facility owner or operator will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard specified below.

The facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the limit specified (except the emission of uncombined water) are observed for three consecutive operating days from the same emission point, the facility owner or operator will notify the Department of the observations within one business day. The facility owner or operator will also perform an EPA Reference Test Method 9 opacity evaluation analysis of the affected emission point and submit the results to the Department.

Daily records of the compliance activity are to be maintained on site for a period of at least five years and

the owner and/or operator will provide an annual summary of the actions taken and compliance status of the process sources relative to this emission requirement.

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: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 6: Compliance Demonstration** 



## **Effective for entire length of Permit**

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

#### Item 6.1:

The Compliance Demonstration activity will be performed for the Facility.

#### Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

- (1) Except as provided for in paragraph (2) below, the owner or operator of any emission source subject to this Subpart must maintain and, upon request, provide the department with a certification from the coating supplier/manufacturer which lists the parameters 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 section 228-1.5(c) of this Subpart, 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 this Part 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 Part 228-1 as set forth in section 228-1.1(b)(9) or (13), or those sources that are using coatings not subject to specific requirements of tPart 228-1 as set forth in 228-1.3(e)(2), or 228-1.4(b)(5)(iii)(e), (i) or (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



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

Condition 7: Surface Coating- Prohibitions
Effective for entire length of Permit

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

#### Item 7.1:

- (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:
- (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 8: Compliance Demonstration Effective for entire length of Permit

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

#### Item & 1.

The Compliance Demonstration activity will be performed for the Facility.

#### Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

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

(1) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;



- (2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
- (i) an enclosed spray gun cleaning system that is kept closed when not in use;
- (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
- (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
- (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR) Reports due 30 days after the reporting period.

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

Condition 9: Surface coating access for sampling Effective for entire length of Permit

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



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#### Item 9.1:

Representatives of the department must be permitted on the facility owner's property, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with the requirements of 6 NYCRR Part 228-1.

Condition 10: Compliance Demonstration
Effective for entire length of Permit

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

#### Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

#### Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Condition 11: Emission Unit Permissible Emissions Effective for entire length of Permit

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

#### Item 11.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited

shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

**Emission Unit: 1-PAINT** 

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 8.7 pounds per hour

17,400 pounds per year

Condition 12: Compliance Demonstration
Effective for entire length of Permit

Air Pollution Control Permit Conditions
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## Applicable Federal Requirement: 6 NYCRR 228-1.4 (b)

#### Item 12.1:

The Compliance Demonstration activity will be performed for:

**Emission Unit: 1-PAINT** 

#### Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility owner or operator will comply with Part 228-1.5(b) by use of compliant coatings or an approved VOC RACT variance per 6 NYVRR Part 228-1.5(e).

All coatings usage will be recorded and reported in a format acceptable to the Department. Annual reports will include coating identifier, substrate, usage, VOC content, and Part 228 VOC limit. Coatings exempt from 228-1.4 will be identified in the table.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

## Condition 13: Compliance Demonstration Effective for entire length of Permit

## Applicable Federal Requirement: 6 NYCRR 228-1.5 (e) (1)

## Item 13.1:

The Compliance Demonstration activity will be performed for:

**Emission Unit: 1-PAINT** 

#### Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility owner or operator will comply with Part 228-1.5(b) by use of compliant coatings or an approved VOC RACT variance per 6 NYVRR Part 228-1.5(e). OMP has submitted a RACT variance for the various coatings currently utilized at the facility, which are above the Part 228 Table B5 limits

for miscellaneous plastic parts coatings. By issuance of this permit with VOC emissions caps and coating limitations, this RACT variance request and OMP may operate with a lesser degree of control (higher coating limits.)

Total facility VOCs are capped at 12 tons per year elsewhere in this permit.

Total coating VOC emissions are capped at 8.7 tons per year elsewhere in this permit.

All coatings usage will be recorded and reported in a format acceptable to the Department. Annual reports will include coating identifier, substrata, usage, VOC content, and Part 228 VOC limit. Coatings exempt from 228-1.4 will be identified in the table.

The following coatings applicable to Table B5, miscellaneous plastic parts - general one component are allowed the following limits, in pounds per gallon minus water and excluded compounds:

```
* coating 7-5030, DTP Tint Base -
Black
4.45 #/gal
   * coating 7-4985, DTP-Plus New
Break-up/Obsession ... 4.27 #/gal
   * coating 7-6845, DTP Tint Base -
Green (blue shade) ... 4.41 #/gal
   * coating 7-7225, DTP Tint Base -
Green (yellow shade) ... 4.39 #/gal
   * coating 7-4940, DTP Fall Tan
... 4.33 #/gal
   * coating 7-5050, DTP Plus Dark
Brown Touch
                        ... 4.38
#/gal
   * coating 7-6860, DTP Brown
... 4.42 #/gal
   * coating 7-6000, DTP Red Iron Oxide
4.43 #/gal
   * coating 7-6905, DTP yellow (green
shade)
                   ... 4.18
```



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\* coating 7-6910, DTP Yellow (redshade) ... 4.39 #/gal \* coating 7-6380, DTP Plus Multicam 4.33 #/gal \* coating 7-7590, DTP Plus Reduced ... 4.42 Highlander #/gal \* coating 7-6335, DTP Plus Muddy Girl ... 4.31 Pink \* coating 7-4945, DTP Plus Treestand Infinity ... 4.28 #/gal \* coating 7-6135, DTP Tint Base -White 4.01 #/gal \* coating 7-6725, DTP Plus Gator Green 4.36 #/gal \* coating 7-6850, DTP Tint Base -Blue ... 4.38 #/gal \* coating 7-6855, DTP Tint Base -Violet ... 4.38 #/gal \* coating 7-6865, DTP Tint Base - Red 4.16 #/gal \* coating 7-6870, DTP Tint Base -Yellow Iron Oxide ... 4.42 #/gal \* coating 7-7310, DTP Plus Wild Camo IM ... 4.32 #/gal \* coating 7-7320, DTP Plus TT Strata 4.25 #/gal \* coating 7-7335, DTP Plus HH White 4.09 #/gal \* coating 7-7345, DTP Plus Kulu Verde WTP-873 ... 4.38 #/gal \* coating 7-7370, DTP Plus WTP-937 Rock Star ... 3.95 #/gal \* coating 7-7435, DTP Plus WTP-787 Multicam Black ... 3.95 #/gal



```
* coating 7-7450, DTP Plus Peak
... 4.32 #/gal
  * coating 7-7455, DTP Plus Veil
Flagship
... 4.32 #/gal
  * coating 7-7460, DTP Plus WTP-941
Desolve Black
                 ... 4.38
#/gal
  * coating 7-7480, DTP Plus Veil
Whitetail
... 4.34 #/gal
  * coating 7-7580, DTP Plus Realtree
Ecsape
4.32 #/gal
  * coating 7-7600, DTP Plus Mossy Oak
Terra elevation YH206 ... 4.34 #/gal
  * coating 7-7605, DTP Plus WTP-117
Forged Carbon
                     ... 4.38
#/gal
  * coating 7-7635, DTP Wild Camo IM
Brush 2
4.34 #/gal
  * coating 7-2085, CC-D1 Polane
SprayFil
 ... 4.60 #/gal
  * coating 7-3200, SPRAYLAT/599-T2000
```

Any coatings not listed are not authorized to be emitted in excess of the limits in Part 228. A significant permit modification would be required to add additional non-compliant coatings and/or sources

6.34 #/gal

Further, OMP will continue to investigate compliance by coating substitution. Within the annual compliance report OMP will detail annual efforts made to substitute compliant coatings, reduce the VOC content of these non-compliant coatings, and/or reduce the usage of non-compliant coatings.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR) Reports due 30 days after the reporting period.



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

Condition 14: Capping Monitoring Condition Effective for entire length of Permit

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

#### Item 14.1:

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 228-1.5 (e)

#### Item 14.2:

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

### Item 14.3:

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 14.4:

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 14.5:

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 14.6:

The Compliance Demonstration activity will be performed for:

**Emission Unit: 1-PAINT** 

Process: 001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

#### Item 14.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes



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

Monitoring Description:

The coating operations of Unit U-PAINT will not emit VOC emissions greater than 8.7 tons/yr on a 12 month rolling basis. Compliance with this limit will be demonstrated by calculating monthly and 12 month rolling VOC emissions utilizing methods acceptable to the Department, including but not limited to production usage data, coating data for VOC containing processes, and/or emission factors.

Parameter Monitored: VOC CONTENT Upper Permit Limit: 8.7 tons per year Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MINIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

## Condition 15: Compliance Demonstration Effective for entire length of Permit

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

#### Item 15.1:

The Compliance Demonstration activity will be performed for:

**Emission Unit: 1-PAINT** 

Process: 001

## Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

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

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

Reference Test Method: EPA Reference Test Method 311 or 24 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



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Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



## STATE ONLY ENFORCEABLE CONDITIONS \*\*\*\* Facility Level \*\*\*\*

#### NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

## Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined 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



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 16:** Contaminant List

Effective for entire length of Permit

Applicable State Requirement: ECL 19-0301

#### Item 16.1:

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: 0NY998-00-0

Name: VOC

Condition 17: Malfunctions and Start-up/Shutdown Activities Effective for entire length of Permit



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

#### Item 17.1:

- (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 18: Emission Unit Definition
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR Subpart 201-5

#### Item 18.1:

The facility is authorized to perform regulated processes under this permit for: Emission Unit: 1-PAINT Emission Unit Description:



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This emission unit consists of eight paint booths (seven manually applied paint booths and one robotically applied paint booth). Emission Source ID's PB001-PB007 are associated with manually operated paint booths and PB008 is associated Iwith the new proposed robotic spray paint booth. The worst case PTE associated with the paint booths is approximately 8.7 tpy, as detailed in attached emission calculations and air dispersion modeling.

Building(s): MAIN

#### Item 18.2:

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

Emission Unit: 1-POZZI Emission Unit Description:

This emission unit consists of one Pozzi Hydrographic System to coat patterns on gun stocks.

Building(s): MAIN

Condition 19: Renewal deadlines for state facility permits
Effective for entire length of Permit

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

## Item 19.1:

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 20: Compliance Demonstration
Effective for entire length of Permit

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

## Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

#### Item 20.2:

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 7 5786 Widewaters Parkway



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Syracuse, NY 13214-1867

Reporting Requirements: ANNUALLY (CALENDAR) Reports due 30 days after the reporting period.

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

## Condition 21: Air pollution prohibited Effective for entire length of Permit

## **Applicable State Requirement: 6 NYCRR 211.1**

#### Item 21.1:

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.

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

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

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

#### Item 22.1:

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

Emission Unit: 1-PAINT

Emission Point: 00005

Height (ft.): 24 Diameter (in.): 24

NYTMN (km.): 4771.381 NYTME (km.): 446.496 Building: MAIN

Emission Point: 00006

Height (ft.): 24 Diameter (in.): 18

NYTMN (km.): 4771.381 NYTME (km.): 446.496 Building: MAIN

Emission Point: 00007

Height (ft.): 24 Diameter (in.): 18

NYTMN (km.): 4771.381 NYTME (km.): 446.496 Building: MAIN

Emission Point: 00008

Height (ft.): 24 Diameter (in.): 18

NYTMN (km.): 4771.381 NYTME (km.): 446.496 Building: MAIN

Emission Point: 00009



## Permit ID: 7-2512-00017/00025 Facility DEC ID: 7251200017

Height (ft.): 24 Diameter (in.): 18

NYTMN (km.): 4771.381 NYTME (km.): 446.496 Building: MAIN

Emission Point: 00010

Height (ft.): 24 Diameter (in.): 18

NYTMN (km.): 4771.381 NYTME (km.): 446.496 Building: MAIN

Emission Point: 00011

Height (ft.): 24 Diameter (in.): 18

NYTMN (km.): 4771.381 NYTME (km.): 446.496 Building: MAIN

Emission Point: 00012

Height (ft.): 24 Diameter (in.): 18

NYTMN (km.): 4771.381 NYTME (km.): 446.496 Building: MAIN

#### Item 22.2:

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

Emission Unit: 1-POZZI

Emission Point: 00020

Height (ft.): 24 Diameter (in.): 6

NYTMN (km.): 4771.381 NYTME (km.): 446.496 Building: MAIN

## Condition 23: Process Definition By Emission Unit Effective for entire length of Permit

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

## Item 23.1:

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

Emission Unit: 1-PAINT

Process: 001 Source Classification Code: 4-02-022-01

**Process Description:** 

This process consists of spray paint operations in seven (7) manually operated paint booths and one robotically operated paint booth. Specifically, for gun stock products, the robotic paint booth will apply either a base coat or top coat depending on production needs. Three (3) of the seven (7) manually operated paint booths will be dedicated to applying for gun stock products either base coat or a top coat. These three dedicated manually operated paint booths will not apply

dedicated manually operated paint booths will not apply the same type of coating (base or top coat) at the same time as the robotically operated paint booth.

One (1) manually paint booth will be used to paint Waters Medical device products consisting of filler base coats and colored top coatings. From time to time the booth may also paint other miscellaneous products that



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meet the VOC/HAP threshold limits set forth within the guidelines of the permits.

The remaining three (3) manually operated paint booths will be utilized to paint coatings for other miscellaneous products that meet the VOC/HAP threshold limits set forth within the guidelines of the permits.

Emission Source/Control: PBK01 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: PBK02 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: PBK03 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: PBK04 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: PBK05 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: PBK06 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: PBK07 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: PBK08 - Control

Control Type: HIGH EFFICIENCY PARTICULATE AIR FILTER

Emission Source/Control: PB001 - Process

Emission Source/Control: PB002 - Process

Emission Source/Control: PB003 - Process

Emission Source/Control: PB004 - Process

Emission Source/Control: PB005 - Process

Emission Source/Control: PB006 - Process

Emission Source/Control: PB007 - Process

Emission Source/Control: PB008 - Process



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## Item 23.2:

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

Emission Unit: 1-POZZI

Process: 002 Source Classification Code: 4-02-022-01

Process Description:

This process consists of coating gun stock with a desired

pattern by dipping the stock into a coating bath containing proprietary coating film and activator.

Emission Source/Control: POZZI - Process



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