



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 8-3226-00023/00029  
Effective Date: 11/06/2017 Expiration Date: 11/05/2022

Permit Issued To: CP HOLDINGS GROUP INC  
26 MAPLE AVE  
BLOOMFIELD, NY 14469

Contact: KEN WARNER  
COMMODORE TECHNOLOGY LLC  
26 MAPLE AVE  
BLOOMFIELD, NY 14469  
(585) 657-7777

Facility: COMMODORE TECHNOLOGY/PLASTICS LLC  
26 MAPLE AVE  
BLOOMFIELD, NY 14469

Description:

Renewal of Title V Facility Permit to authorize operations at the Commodore Technology LLC facility, which manufactures polystyrene foam food packaging.

- Emission Unit U00001 consists of six (6) foam extruder lines, two (2) foam reclaim lines, foam thermal formers and foam roll storage.
- Emission Unit U00002 consists of sixteen (16) material storage silos.
- Emission Unit U00003 consists of one (1) paint booth and surface coating operations.

The plant meets the definition of a Major Source in 6 NYCRR Part 201-2.1(b)(21) and is subject to Part 201-6 Title V regulations due to VOC emissions in excess of 50 tons per year.

This permit also includes a variance to avoid emission control requirements specified in 6 NYCRR Part 212.3 RACT for VOC emissions. The variance allows operation of 6 foam extruders, thermoforming operations, and foam roll storage without emission controls, based on low concentrations of slowly released VOC resulting in costs for emission control significantly in excess of the Department's guideline level per ton of emissions controlled. Re-evaluation of the RACT variance will be required if potential VOC emissions from all sources increase to reach 150 tons per year.

Foam reclamation operations, with higher VOC release rates, continue to be vented through a thermal oxidizer for VOC emission control.



**New York State Department of Environmental Conservation**  
**Facility DEC ID: 8322600023**



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:           SCOTT SHEELEY  
  NYSDEC - REGION 8  
  6274 E AVON-LIMA RD  
  AVON, NY 14414

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 8 HEADQUARTERS



**DEC GENERAL CONDITIONS**

\*\*\*\* General Provisions \*\*\*\*

**For the purpose of your Title V permit, the following section contains  
state-only enforceable terms and conditions.**

**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**

**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

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

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3**

Permits are transferrable with the approval of the department unless specifically prohibited by



the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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

**Item 4.1:**

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

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

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

**Condition 5: Submission of application for permit modification or renewal-REGION 8 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 8 Headquarters  
Division of Environmental Permits  
6274 Avon-Lima Road  
Avon, NY 14414-9519  
(585) 226-2466

**New York State Department of Environmental Conservation**

Permit ID: 8-3226-00023/00029

Facility DEC ID: 8322600023



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

**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: CP HOLDINGS GROUP INC  
26 MAPLE AVE  
BLOOMFIELD, NY 14469

Facility: COMMODEORE TECHNOLOGY/PLASTICS LLC  
26 MAPLE AVE  
BLOOMFIELD, NY 14469

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

Permit Effective Date: 11/06/2017

Permit Expiration Date: 11/05/2022





**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
  - 2 6 NYCRR 201-6.4 (a) (7): Fees
  - 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
  - 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
  - 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
  - 6 6 NYCRR 201-6.4 (e): Compliance Certification
  - 7 6 NYCRR 202-2.1: Compliance Certification
  - 8 6 NYCRR 202-2.5: Recordkeeping requirements
  - 9 6 NYCRR 215.2: Open Fires - Prohibitions
  - 10 6 NYCRR 200.7: Maintenance of Equipment
  - 11 6 NYCRR 201-1.7: Recycling and Salvage
  - 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
  - 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
  - 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
  - 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
  - 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
  - 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
  - 18 6 NYCRR 202-1.1: Required Emissions Tests
  - 19 40 CFR Part 68: Accidental release provisions.
  - 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
  - 21 6 NYCRR Subpart 201-6: Emission Unit Definition
  - 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
  - 23 6 NYCRR 211.1: Air pollution prohibited
  - 24 6 NYCRR 212-2.1 (b): Compliance Certification
  - 25 6 NYCRR 212-2.4 (b): Compliance Certification
  - 26 6 NYCRR 228-1.1 (a) (3): Once in always in
  - 27 6 NYCRR 228-1.3 (b): Compliance Certification
  - 28 6 NYCRR 228-1.3 (c): Surface Coating- Prohibitions
  - 29 6 NYCRR 228-1.3 (d): Compliance Certification
  - 30 6 NYCRR 228-1.3 (e) (2): Compliance Certification
- Emission Unit Level**
- 31 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
  - 32 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

**EU=U-00001**

- 33 6 NYCRR 212-1.6 (a): Compliance Certification

**EU=U-00001,Proc=ROL**

- 34 6 NYCRR 212-3.1 (c) (1): Compliance Certification

**EU=U-00001,EP=EP001**

- 35 6 NYCRR 212-3.1 (c) (4) (i): Compliance Certification



**EU=U-00001,EP=EP001,Proc=EXT,ES=EXT01**

36 6 NYCRR 212-1.7 (b) (5): Compliance Certification

**EU=U-00003**

37 6 NYCRR 228-1.3 (a): Compliance Certification

38 6 NYCRR 228-1.3 (e): Surface Coating- application requirements

39 6 NYCRR 228-1.4 (b) (4) (ii): Compliance Certification

40 6 NYCRR 228-1.6 (a): Compliance Certification

41 6 NYCRR 228-1.6 (c): Surface coating access for sampling

42 6 NYCRR 228-1.6 (h): Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

43 ECL 19-0301: Contaminant List

44 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

45 6 NYCRR 211.2: Visible Emissions Limited

**Emission Unit Level**

**EU=U-00003**

46 6 NYCRR 212-2.1 (a): Compliance Demonstration



**FEDERALLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.**

**Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)**

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

**Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (a) (4)**

Owners and/or operators of facilities having an issued Title V 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.

**Item C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)**

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**Item D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)**

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

**Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)**

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and



reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

**Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)**

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

**Item G: Property Rights - 6 NYCRR 201-6.4 (a) (6)**

This permit does not convey any property rights of any sort or any exclusive privilege.

**Item H: Severability - 6 NYCRR 201-6.4 (a) (9)**

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

**Item I: Permit Shield - 6 NYCRR 201-6.4 (g)**

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V



facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item J: Reopening for Cause - 6 NYCRR 201-6.4 (i)**

This Title V permit shall be reopened and revised under any of the following circumstances:

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the department pursuant to the provisions of section 201- 6.6 of this Subpart.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**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.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.**

**Condition 1: Acceptable Ambient Air Quality  
Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement: 6 NYCRR 200.6**

**Item 1.1:**

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





reports required by the permit.

**Condition 5: Compliance Certification**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)**

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements,





the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual



report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 6: Compliance Certification**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as



specified in any special permit terms or conditions;  
and  
- such additional requirements as may be specified  
elsewhere in this permit related to compliance  
certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section  
USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
NYSDEC Region 8 Headquarters  
6274 East Avon-Lima Road  
Avon, NY 14414-9519

The address for the BQA is as follows:

NYSDEC





**Applicable Federal Requirement:6 NYCRR 215.2**

**Item 9.1:**

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

**Item 9.2**

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS**







**Condition 17: Off Permit Changes**

**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)**

**Item 17.1:**

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

**Condition 18: Required Emissions Tests**

**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 18.1:**

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

**Condition 19: Accidental release provisions.**

**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement:40 CFR Part 68**

**Item 19.1:**

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;



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b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center  
C/O CSC  
8400 Corporate Dr  
Carrollton, Md. 20785

**Condition 20: Recycling and Emissions Reduction**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement:40CFR 82, Subpart F**

**Item 20.1:**

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

**The following conditions are subject to annual compliance certification requirements for Title V permits only.**

**Condition 21: Emission Unit Definition**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 21.1:**

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

Emission Unit: U-00001

Emission Unit Description:

six foam extrusion lines, two foam reclaim lines, foam thermal formers and foam roll storage.

Building(s): Building D

**Item 21.2:**

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

Emission Unit: U-00002

Emission Unit Description:

16 Material storage silos

Building(s): Building D  
Outside

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**Item 21.3:**

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

Emission Unit: U-00003

Emission Unit Description:

This emission unit consists of surface coating operations

Building(s): Building B

**Condition 22: Progress Reports Due Semiannually**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)**

**Item 22.1:**

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Condition 23: Air pollution prohibited**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 23.1:**

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 24: Compliance Certification**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 24.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001



Emission Unit: U-00002

Emission Unit: U-00003

**Item 24.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Table 3 – Degree of Air Cleaning Required for Criteria Air Contaminants, or Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental rating assigned to the contaminant by the department.

The listed non-HTAC contaminants have been demonstrated to be in compliance with 6 NYCRR Part 212-2.1(b) by meeting either:

- 1- the degree of air cleaning required for the rating given to each contaminant, or
- 2- the NAAQS, or
- 3- the DAR-1 guideline concentrations.

The facility owner or operator shall verify the parameters used to demonstrate compliance with Table 3 or Table 4 semi-annually. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer's or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating of any contaminant may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

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At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Records of observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the semi-annual compliance monitoring reports.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 25: Compliance Certification**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 25.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001

Emission Unit: U-00003

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 25.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance verifications semi-annually. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate,



process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate. These semi-annual compliance verifications do not include a Method 5 emissions evaluation.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that the permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.05 grains per dscf  
Reference Test Method: METHOD 5  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2018.  
Subsequent reports are due every 6 calendar month(s).

**Condition 26: Once in always in**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 26.1:**

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 27: Compliance Certification**

Effective between the dates of 11/06/2017 and 11/05/2022

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

**Item 27.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 27.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(A) Except as provided for in paragraph (B) below, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

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

(B) Owners and operators of emission sources not subject to 6NYCRR 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 6NYCRR Part 228-1 as set forth in section 228-1.3(e)(2), or section 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.



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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 28: Surface Coating- Prohibitions**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 28.1:**

(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 29: Compliance Certification**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 29.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 29.2:**

Compliance Certification 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: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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The initial report is due 1/30/2018.  
Subsequent reports are due every 6 calendar month(s).

**Condition 30: Compliance Certification**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 30.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility containing a coating line (other than a class  
A coating line) may use up to 55 gallons of coatings  
(facility wide) on a 12-month rolling total basis which  
does not comply with the VOC content limits set forth in  
section 228-1.4 ; provided such use is recorded on an as  
used basis and maintained at the facility for a period of  
five years.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 6 calendar month(s).

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

**Condition 31: Emission Point Definition By Emission Unit**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 31.1:**

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

Emission Unit: U-00001

Emission Point: EP001

Height (ft.): 20

Diameter (in.): 24

NYTMN (km.): 4752.316 NYTME (km.): 302.926

Emission Point: EP023

Height (ft.): 26

Diameter (in.): 7

NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

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**Item 31.2:**

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

Emission Unit: U-00002

Emission Point: EP003

Height (ft.): 36 Diameter (in.): 20  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP004

Height (ft.): 36 Diameter (in.): 20  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP005

Height (ft.): 36 Diameter (in.): 20  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP006

Height (ft.): 33 Diameter (in.): 16  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP007

Height (ft.): 33 Diameter (in.): 16  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP008

Height (ft.): 36 Diameter (in.): 20  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP009

Height (ft.): 33 Diameter (in.): 16  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP010

Height (ft.): 36 Diameter (in.): 20  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP011

Height (ft.): 33 Diameter (in.): 16  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP012

Height (ft.): 14 Diameter (in.): 16  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP013

Height (ft.): 14 Diameter (in.): 16  
NYTMN (km.): 4752.316 NYTME (km.): 302.926 Building: Outside

Emission Point: EP014

Height (ft.): 26 Diameter (in.): 7





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Process: EXT Source Classification Code: 3-08-010-05

Process Description:  
6 foam extrusion lines.

Extruder EXT06 will exhaust to BAG03.

4 uncontrolled extruders, no Emission Point, general room ventilation. Uncontrolled emissions < 3.0 lbs/hr VOC.

Emission Source/Control: BAG03 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: EXT01 - Process

Emission Source/Control: EXT02 - Process

Emission Source/Control: EXT03 - Process

Emission Source/Control: EXT04 - Process

Emission Source/Control: EXT05 - Process

Emission Source/Control: EXT06 - Process

**Item 32.2:**

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

Emission Unit: U-00001

Process: RCL Source Classification Code: 3-08-010-05

Process Description:  
2 foam reclaim lines and emissions from fluff cyclone.  
All emissions exhaust to oxidizer OX001 via baghouse BAG01.

Emission Source/Control: BAG01 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: OX001 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: RCL01 - Process

Emission Source/Control: RCL02 - Process

**Item 32.3:**

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

Emission Unit: U-00001

Process: ROL Source Classification Code: 3-08-010-05

Process Description:  
Storage of extruded foam rolls, no Emission Point, general room ventilation. Uncontrolled emissions > 3.0



lbs/hr. Acceptable RACT demonstration provided  
(03/25/16). RACT is no control.

Emission Source/Control: ROL01 - Process

**Item 32.4:**

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

Emission Unit: U-00001  
Process: THF Source Classification Code: 3-08-010-05  
Process Description:  
Foam thermal formers, no Emission Point, general room  
ventilation. Uncontrolled emissions are < 3.0 lbs/hr.

Emission Source/Control: THF01 - Process

Emission Source/Control: THF02 - Process

Emission Source/Control: THF03 - Process

Emission Source/Control: THF04 - Process

Emission Source/Control: THF05 - Process

Emission Source/Control: THF06 - Process

Emission Source/Control: THF07 - Process

Emission Source/Control: THF08 - Process

Emission Source/Control: THF09 - Process

Emission Source/Control: THF10 - Process

Emission Source/Control: THF11 - Process

Emission Source/Control: THF12 - Process

Emission Source/Control: THF13 - Process

Emission Source/Control: THF14 - Process

**Item 32.5:**

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

Emission Unit: U-00002  
Process: SIL Source Classification Code: 3-08-008-03  
Process Description:  
Storage silos used to store both raw and reclaimed  
materials for the production of foam products.

Emission Source/Control: SIL01 - Process

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Emission Source/Control: SIL02 - Process

Emission Source/Control: SIL03 - Process

Emission Source/Control: SIL04 - Process

Emission Source/Control: SIL05 - Process

Emission Source/Control: SIL06 - Process

Emission Source/Control: SIL07 - Process

Emission Source/Control: SIL08 - Process

Emission Source/Control: SIL09 - Process

Emission Source/Control: SIL10 - Process

Emission Source/Control: SIL11 - Process

Emission Source/Control: SIL12 - Process

Emission Source/Control: SIL13 - Process

Emission Source/Control: SIL14 - Process

Emission Source/Control: SIL15 - Process

Emission Source/Control: SIL16 - Process

**Item 32.6:**

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

Emission Unit: U-00003

Process: PAI

Source Classification Code: 4-02-001-01

Process Description: Paint booth and surface coating operations

Emission Source/Control: FAF01 - Control

Control Type: FABRIC FILTER

Emission Source/Control: PAI01 - Process

**Condition 33: Compliance Certification**

**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 33.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00001

New York State Department of Environmental Conservation

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Facility DEC ID: 8322600023



Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 33.2:**

Compliance Certification 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 a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies daily while the process is in operation. The permittee 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.

The permittee 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 standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

The facility will limit the opacity of emissions by maintaining the Spencer Vacuum fabric cleaner in accordance with the manufacturer's instructions. A copy of the instructions and documentation of all maintenance will be maintained in a binder or log book.

Parameter Monitored: OPACITY

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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.  
The initial report is due 1/30/2018.  
Subsequent reports are due every 12 calendar month(s).

**Condition 34: Compliance Certification**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement: 6 NYCRR 212-3.1 (c) (1)**

**Item 34.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00001  
Process: ROL

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

**Item 34.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

RACT for roll storage has been determined to be no control per the 2/2016 RACT analysis.

The facility will be required to update the RACT analysis once per permit term. Additionally, should VOC emission from roll storage or other uncontrolled emission sources at the facility increase significantly, the facility will be required to update the RACT analysis. Current calculations show a facility VOC pte of 128.48 tpy. Any proposed increase to 150 tpy VOC or greater will be a major modification and will require a RACT re-evaluation.

The facility will keep records and calculate emissions on a 12 month rolling average. The facility will update the facility wide pte semi-annually and the update will be submitted with the semi-annual monitoring report.

Parameter Monitored: VOC  
Upper Permit Limit: 150 tons per year  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION



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Averaging Method: 12-month rolling average  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2018.  
Subsequent reports are due every 6 calendar month(s).

**Condition 35: Compliance Certification**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement:6 NYCRR 212-3.1 (c) (4) (i)**

**Item 35.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00001                      Emission Point: EP001

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

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

    Volatile organic compound emission points which are equipped with a capture and control device with an overall removal efficiency of at least 81% are equipped with Reasonably Available Control Technology.

    The September 23, 2015 Test Report shows compliance with this limit.

    Commodore will be required to re-test the source once per permit term.

Parameter Monitored: VOC

Lower Permit Limit: 81 percent reduction by weight

Reference Test Method: 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 36: Compliance Certification**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable Federal Requirement:6 NYCRR 212-1.7 (b) (5)**

**Item 36.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00001                      Emission Point: EP001



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Permit ID: 8-3226-00023/00029

Facility DEC ID: 8322600023

Process: EXT

Emission Source: EXT01

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 36.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The chamber temperature of the Thermal Oxidizer shall be continually monitored.

Thermal Oxidizer chamber temperature shall be maintained at 1349 Degrees Farenheit or greater to ensure compliance with 6 NYCRR 212-3(c)(4)(i) for removal efficiency of 81% or greater for VOCs.

Continuous monitors must be operated at all times when the associated emission control equipment is operating except during any quality assurance and routine maintenance activities. Each monitor must be operated according to a quality assurance program approved by the department. Alternative monitoring methods may be employed subject to department approval.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1349 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 37: Compliance Certification**

**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 37.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00003

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 37.2:**

Compliance Certification shall include the following monitoring:



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

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies daily while the process is in operation. The permittee 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.

The permittee 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 standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

The facility will limit the opacity of emissions by maintaining the Spencer Vacuum fabric cleaner in accordance with the manufacturer's instructions. A copy of the instructions and documentation of all maintenance will be maintained in a binder or log book.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: METHOD 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)





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Facility DEC ID: 8322600023

CAS No: 0NY998-00-0 VOC

**Item 39.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A facility applying 'miscellaneous metal parts coatings'  
may not use coatings with VOC contents, as applied, which  
exceed 2.8 pounds VOC per gallon.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.8 pounds per gallon

Monitoring Frequency: SEMI-ANNUALLY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 6 calendar month(s).

**Condition 40: Compliance Certification**

**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 40.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00003

**Item 40.2:**

Compliance Certification 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

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 41: Surface coating access for sampling**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 41.1:**

This Condition applies to Emission Unit: U-00003

**Item 41.2:**

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 42: Compliance Certification**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 42.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00003

**Item 42.2:**

Compliance Certification 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



**STATE ONLY ENFORCEABLE CONDITIONS**

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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

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

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

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

**Item B: 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 applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.**

**Condition 43: Contaminant List**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 43.1:**

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

CAS No: 001313-13-9  
Name: MANGANESE OXIDE

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

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

**Condition 44: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

**Item 44.1:**

(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.



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

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

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

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

**Condition 45: Visible Emissions Limited**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 45.1:**

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.

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

**Condition 46: Compliance Demonstration**  
**Effective between the dates of 11/06/2017 and 11/05/2022**

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

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Facility DEC ID: 8322600023



**Item 46.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00003

Regulated Contaminant(s):

CAS No: 001313-13-9 MANGANESE OXIDE

**Item 46.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants under 6 NYCRR Part 212-2.3, as applicable, for the environmental rating assigned to the contaminant by the department.

The emissions of Manganese Oxide have been demonstrated to be in compliance with 6 NYCRR Part 212-2.1. Any proposed increase in Manganese Oxide that would result in emissions greater than 10 pounds per year shall require a permit modification prior to implementation of such increase.

The facility owner or operator shall verify the parameters used to demonstrate compliance with 6 NYCRR Part 212 semi-annually. These parameters include, but are not limited to engineering emission estimates, mass balances, process flows, production records, control equipment parameters, manufacturer's or published emission factors, etc. Any significant change to these parameters or any method of operation which could conceivably increase the emissions, increase the emission rate potential, decrease the air cleaning control efficiency, or be cause to alter the environmental rating may be considered a modification to the permit and will require a reevaluation to ensure continued compliance with Part 212.

Additionally, the facility owner or operator will investigate, in a timely manner, any instance where there is reason to believe that there is or has been an emissions increase above those that are listed on the application, or that Part 212 emissions standards may have been or continue to be exceeded. In such cases, the facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the potential excess emissions problem has been corrected.

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At all times, the facility owner or operator must operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safe, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

Records of observations, investigations and corrective actions will be kept on-site. A summary of these records will be included in the semi-annual compliance monitoring reports.

Parameter Monitored: MANGANESE OXIDE

Upper Permit Limit: 10 pounds per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED MORE THAN ONCE PER CALENDAR YEAR

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 6 calendar month(s).

