

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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 8-4674-00004/00107  
Effective Date: 12/22/2025 Expiration Date: 12/21/2035

Permit Issued To: THE GUNLOCKE COMPANY L.L.C.  
1 GUNLOCKE DR  
WAYLAND, NY 14572-9515

Contact: DANIEL LANDER  
THE GUNLOCKE COMPANY  
1 GUNLOCKE DR.  
WAYLAND, NY 14572  
(585) 447-1254

Facility: THE GUNLOCKE COMPANY  
1 GUNLOCKE DR  
Wayland, NY 14572

Contact: DANIEL LANDER  
THE GUNLOCKE COMPANY  
1 GUNLOCKE DR.  
WAYLAND, NY 14572  
(585) 447-1254

Description:

New Air State Facility permit for The Gunlocke Company in Wayland which manufactures wood chairs and case goods. Facility operations include wood and particle board machining and sanding operations, wood preparation and coating lines, and two steam production boilers.

This facility was previously required to maintain a Title V Facility Permit, initially issued June 12, 2000, due to potential emissions in excess of applicability thresholds for VOCs and Hazardous Air Pollutants (HAPs).

Changes in this permit include the following facility-wide emissions caps, on a rolling 12-month basis, to avoid 6 NYCRR Subpart 201-6 Title V permit requirements: VOC and HAP emissions, calculated monthly based on facility chemical usage records, would be limited below 49 tons per year (tpy) for VOC, and below 24 tpy for total HAP and 9 tpy for any individual HAP. Particulates emissions, calculated monthly based on facility woodworking, combustion, and coating usage records, would be capped below 99 tpy. The proposed permit also removes wood waste as a fuel for the small boiler. Both boilers will fire only on natural gas.

**Facility DEC ID: 8467400004**

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:           ASHLEY N RUBACHA  
  NYS DEC - REGION 8  
  6274 E AVON LIMA RD  
  AVON, NY 14414-9519

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.

**PAGE LOCATION OF CONDITIONS**

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**DEC GENERAL CONDITIONS**

**General Provisions**

- 5 1 Facility Inspection by the Department
- 5 2 Relationship of this Permit to Other Department Orders and Determinations
- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Permit modifications, suspensions or revocations by the Department

**Facility Level**

- 6 5 Submission of application for permit modification or renewal-REGION 8 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.

**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

**Permit ID: 8-4674-00004/00107**

**Facility DEC ID: 8467400004**

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

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: THE GUNLOCKE COMPANY L.L.C.  
1 GUNLOCKE DR  
WAYLAND, NY 14572-9515

Facility: THE GUNLOCKE COMPANY  
1 GUNLOCKE DR  
Wayland, NY 14572

Authorized Activity By Standard Industrial Classification Code:  
2521 - WOOD OFFICE FURNITURE  
9999 - NONCLASSIFIABLE ESTABLISHMENTS

Permit Effective Date: 12/22/2025

Permit Expiration Date: 12/21/2035

**PAGE LOCATION OF CONDITIONS**

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**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 6 1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- 6 \*2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 7 \*3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 9 \*4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 10 \*5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 11 \*6 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 12 \*7 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 14 \*8 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 15 9 6 NYCRR 211.2: Visible Emissions Limited
- 15 10 6 NYCRR 227-1.3 (c): Compliance Demonstration
- 16 11 6 NYCRR 228-1.1 (b) (9): Compliance Demonstration
- 16 12 6 NYCRR 228-1.3 (a): Compliance Demonstration

**Emission Unit Level**

**EU=1-00000**

- 19 12 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 20 13 6 NYCRR 228-1.3 (d): Compliance Demonstration
- 21 14 6 NYCRR 228-1.4 (c) (3): Compliance Demonstration
- 21 15 6 NYCRR 228-1.4 (c) (3): Compliance Demonstration
- 22 16 6 NYCRR 228-1.4 (c) (3): Compliance Demonstration
- 23 17 6 NYCRR 228-1.4 (c) (3): Compliance Demonstration
- 23 18 6 NYCRR 228-1.4 (c) (3): Compliance Demonstration

**EU=4-00000**

- 24 19 6 NYCRR 227-1.4 (a): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 27 20 ECL 19-0301: Contaminant List
- 28 21 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 29 22 6 NYCRR Subpart 201-5: Emission Unit Definition
- 29 23 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 29 24 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 30 25 6 NYCRR 211.1: Air pollution prohibited
- 30 26 6 NYCRR 212-2.1 (a): Compliance Demonstration

**Emission Unit Level**

- 31 27 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 33 28 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.

**FEDERALLY ENFORCEABLE CONDITIONS**  
FINAL \*\*\*\* Facility Level \*\*\*\*

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

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

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

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

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

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, 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 between the dates of 12/22/2025 and 12/21/2035**

**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: 000100-41-4 Name: ETHYLBENZENE	PTE: 18,000 pounds per year
CAS No: 000108-10-1 Name: 2-PENTANONE, 4-METHYL	PTE: 18,000 pounds per year
CAS No: 000108-88-3 Name: TOLUENE	PTE: 18,000 pounds per year
CAS No: 001330-20-7 Name: XYLENE, M, O & P MIXT.	PTE: 18,000 pounds per year
CAS No: 0NY075-00-0 Name: PARTICULATES	PTE: 198,000 pounds per year
CAS No: 0NY100-00-0 Name: TOTAL HAP	PTE: 48,000 pounds per year
CAS No: 0NY998-00-0 Name: VOC	PTE: 98,000 pounds per year

**Condition 2: Capping Monitoring Condition**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

**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 201-6.2 (h)

**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 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: 0NY075-00-0 PARTICULATES

**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:

Particulate emissions will be calculated monthly based on facility woodworking, combustion, and coating usage records. Calculations will be performed using EPA's AP-42 emission factors or alternative approved by the Department. The total emissions of particulates will not exceed 99 tons per year calculated on a rolling 12-month basis. The first report is due on January 30, 2026.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 198000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

**Condition 3: Capping Monitoring Condition**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7****Item 3.1:**

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

6 NYCRR 201-6.2 (h)

**Item 3.2:**

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

**Item 3.3:**

The owner or operator of the permitted facility must maintain all required records on-site for a 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 3.4:**

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 3.5:**

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 3.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 3.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

VOC emissions will be calculated monthly based on facility chemical usage records. Calculations will be performed as outlined in the emission calculation attached to the application. The total emissions of VOC will not exceed 49 tons per year calculated on a rolling 12-month basis. The first report is due on January 30, 2026.

Parameter Monitored: VOC  
Upper Permit Limit: 98000 pounds per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2026.  
Subsequent reports are due every 12 calendar month(s).

**Condition 4: Capping Monitoring Condition**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 4.1:**

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

6 NYCRR 201-6.2 (h)  
40 CFR Part 63, Subpart JJ

**Item 4.2:**

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

**Item 4.3:**

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

**Item 4.4:**

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

**Item 4.5:**

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

**Item 4.6:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 4.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

HAP emissions will be calculated monthly based on facility chemical usage records. Calculations will be performed as outlined in the emission calculation attached to the application. The total emissions of HAPs will not exceed 24 tons per year calculated on a rolling 12-month basis. The first report is due on January 30, 2026.

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 48000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

**Condition 5: Capping Monitoring Condition**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 5.1:**

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

6 NYCRR 201-6.2 (h)  
40 CFR Part 63, Subpart JJ

**Item 5.2:**

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

**Item 5.3:**

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

**Item 5.4:**

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

**Item 5.5:**

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

**Item 5.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 000108-88-3      TOLUENE

**Item 5.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

HAP emissions will be calculated monthly based on facility chemical usage records. Calculations will be performed as outlined in the emission calculation attached to the application. The total emissions of any individual HAP will not exceed 9 tons per year calculated on a rolling 12-month total basis. The first report is due on January 30, 2026.

Parameter Monitored: TOLUENE

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

**Condition 6:      Capping Monitoring Condition**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 6.1:**

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

6 NYCRR 201-6.2 (h)  
40 CFR Part 63, Subpart JJ

**Item 6.2:**

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

**Item 6.3:**

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 6.4:**

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 6.5:**

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 6.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000108-10-1      2-PENTANONE, 4-METHYL

**Item 6.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

HAP emissions will be calculated monthly based on facility chemical usage records. Calculations will be performed as outlined in the emission calculation attached to the application. The total emissions of any individual HAP will not exceed 9 tons per year calculated on a rolling 12-month total basis. The first report is due on January 30, 2026.

Parameter Monitored: 2-PENTANONE, 4-METHYL

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

**Condition 7:      Capping Monitoring Condition**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 7.1:**

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

6 NYCRR 201-6.2 (h)  
40 CFR Part 63, Subpart JJ

**Item 7.2:**

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

**Item 7.3:**

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 7.4:**

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 7.5:**

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 7.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 001330-20-7 XYLENE, M, O & P MIXT.

**Item 7.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

HAP emissions will be calculated monthly based on facility chemical usage records. Calculations will be performed as outlined in the emission calculation attached to the application. The total emissions of any individual HAP will not exceed 9 tons per year calculated on a rolling 12-month total basis. The first report is due on January 30, 2026.

Parameter Monitored: XYLENE, M, O & P MIXT.

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL TOTAL ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2026.  
Subsequent reports are due every 12 calendar month(s).

**Condition 8: Capping Monitoring Condition**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 8.1:**

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

6 NYCRR 201-6.2 (h)  
40 CFR Part 63, Subpart JJ

**Item 8.2:**

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

**Item 8.3:**

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 8.4:**

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 8.5:**

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 8.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 000100-41-4      ETHYLBENZENE

**Item 8.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

HAP emissions will be calculated monthly based on facility chemical usage records. Calculations will be performed as outlined in the emission calculation attached to the application. The total emissions of any individual HAP will not exceed 10 tons per year calculated on a rolling 12-month total basis. The first report is due on January 30, 2026.

Parameter Monitored: ETHYLBENZENE

Upper Permit Limit: 18000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

**Condition 9: Visible Emissions Limited**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 9.1:**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

**Applicable Federal Requirement:6 NYCRR 227-1.3 (c)**

**Item 10.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 4-00000

Process: 400

Emission Source: 00041

Emission Unit: 4-00000

Process: 400

Emission Source: 00051

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a stationary combustion

installation must perform an annual tune-up on each emission source subject to 6 NYCRR Subpart 227-1. Records of the tune-up shall be maintained at the facility or at a Department approved alternative location for a minimum of five years. The records shall, at a minimum, include the date the tune-up(s) occurred and the details of the tune-up procedures for each emission source.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 11: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

**Applicable Federal Requirement:6 NYCRR 228-1.1 (b) (9)**

**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A facility performing surface coating operations may use up to 55 gallons of coating or have up to 400 lbs of VOC emissions on a 12-month rolling total that is not subject to the requirements of Subpart 228-1. This exemption is contingent on the owner or operator of the facility maintaining records of such surface coatings, and maintaining compliance with all requirements of section 228-1.3

Parameter Monitored: VOLUME

Upper Permit Limit: 55 gallons

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

**Condition 12: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 12.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-00000	Emission Point: 1S001
Emission Unit: 1-00000	Emission Point: 1S003
Emission Unit: 1-00000	Emission Point: 1S004
Emission Unit: 1-00000	Emission Point: 1S006
Emission Unit: 1-00000	Emission Point: 1S007
Emission Unit: 1-00000	Emission Point: 1S010
Emission Unit: 1-00000	Emission Point: 1S011
Emission Unit: 1-00000	Emission Point: 1S012
Emission Unit: 1-00000	Emission Point: 1S013
Emission Unit: 1-00000	Emission Point: 1S014
Emission Unit: 1-00000	Emission Point: 1S015
Emission Unit: 1-00000	Emission Point: 1S016
Emission Unit: 1-00000	Emission Point: 1S017
Emission Unit: 1-00000	Emission Point: 1S018
Emission Unit: 1-00000	Emission Point: 1S019
Emission Unit: 1-00000	Emission Point: 1S020
Emission Unit: 1-00000	Emission Point: 1S021
Emission Unit: 1-00000	Emission Point: 1S023
Emission Unit: 1-00000	Emission Point: 1S024
Emission Unit: 1-00000	Emission Point: 1S029
Emission Unit: 1-00000	Emission Point: 1S030
Emission Unit: 1-00000	Emission Point: 1S031
Emission Unit: 1-00000	Emission Point: 1S032
Emission Unit: 1-00000	Emission Point: 1S033
Emission Unit: 1-00000	Emission Point: 1S035
Emission Unit: 1-00000	Emission Point: 1S036

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

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

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

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

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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

**Condition 12: Compliance Demonstration**  
Effective between the dates of 12/22/2025 and 12/21/2035

**Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)**

**Item 12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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.

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 13: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

**Item 13.2:**

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:

- (a) 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;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) 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;
- (e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (f) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (g) clean hand held spray guns by one of the following:
  - (1) an enclosed spray gun cleaning system that is kept closed when not in use;
  - (2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
  - (3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
  - (4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC

solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

**Condition 14: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Acid-cured alkyd amino conversion varnish used as topcoat shall be limited to 2.0 kg VOC/kg solids (lb VOC/lb solids). Records of manufacturer specification sheets or SDS sheets with VOC content listed must be maintained onsite for each coating used in the past 5 years. If thinners or coatings are mixed onsite, then the formula must meet the required coating limit above. Combined VOC percentages of mixed coatings must be recorded.

Parameter Monitored: COATING

Upper Permit Limit: 2.0 kilograms VOC per kilogram  
 solids applied

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 15: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

**Applicable Federal Requirement:6 NYCRR 228-1.4 (c) (3)****Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Acid-cured alkyd amino vinyl sealers used as basecoat shall be limited to 2.3 kg VOC/kg solids (lb VOC/lb solids). Records of manufacturer specification sheets or SDS sheets with VOC content listed must be maintained onsite for each coating used in the past 5 years. If thinners or coatings are mixed onsite, then the formula must meet the required coating limit above. Combined VOC percentages of mixed coatings must be recorded.

Parameter Monitored: COATING

Upper Permit Limit: 2.3 kilograms VOC per kilogram  
solids applied

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

**Applicable Federal Requirement:6 NYCRR 228-1.4 (c) (3)****Item 16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Low VOC topcoats shall be limited to 0.80 kg VOC/kg solids (lb VOC/lb solids). Records of manufacturer specification sheets or SDS sheets with VOC content listed must be maintained onsite for each coating used in the past 5 years. If thinners or coatings are mixed onsite, then the formula must meet the required coating limit above. Combined VOC percentages of mixed coatings must be recorded.

Parameter Monitored: COATING

Upper Permit Limit: 0.80 kilograms VOC per kilogram  
solids applied

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 17: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

High solids topcoats shall be limited to 1.8 kg VOC/kg solids (lb VOC/lb solids). Records of manufacturer specification sheets or SDS sheets with VOC content listed must be maintained onsite for each coating used in the past 5 years. If thinners or coatings are mixed onsite, then the formula must meet the required coating limit above. Combined VOC percentages of mixed coatings must be recorded.

Parameter Monitored: COATING

Upper Permit Limit: 1.8 kilograms VOC per kilogram  
solids applied

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 18: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 18.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00000

**Item 18.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

High solids sealers shall be limited to 1.9 kg VOC/kg solids (lb VOC/lb solids). Records of manufacturer specification sheets or SDS sheets with VOC content listed must be maintained onsite for each coating used in the past 5 years. If thinners or coatings are mixed onsite, then the formula must meet the required coating limit above. Combined VOC percentages of mixed coatings must be recorded.

Parameter Monitored: COATING

Upper Permit Limit: 1.9 kilograms VOC per kilogram  
solids applied

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 19: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

**Applicable Federal Requirement:6 NYCRR 227-1.4 (a)**

**Item 19.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-00000

**Item 19.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a stationary combustion installation, at an Air State facility subject to this Subpart which is permitted to fire only natural gas, shall operate an emission source which exhibits greater than 20 percent opacity (based on a six minute average), except for one 6 minute period per hour of not more than 27 percent opacity. The owner or operator will conduct a Method 9 test upon the request of the Department. A report of the results of the test will be submitted to the Department within 30 days of the completion of the Method 9 test. All records generated by the permittee must be maintained at the facility or at an alternative location approved by the Department for a minimum of five years.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: 40 CFR 60, Appendix A, Method 9

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

**Permit ID: 8-4674-00004/00107**

**Facility DEC ID: 8467400004**

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

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 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 20: Contaminant List**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 20.1:**

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

CAS No: 000100-41-4  
Name: ETHYLBENZENE

CAS No: 000108-10-1  
Name: 2-PENTANONE, 4-METHYL

CAS No: 000108-88-3  
Name: TOLUENE

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

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY998-00-0

Name: VOC

**Condition 21: Malfunctions and Start-up/Shutdown Activities**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 21.1:**

(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 22: Emission Unit Definition**

Effective between the dates of 12/22/2025 and 12/21/2035

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

**Item 22.1:**

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

Emission Unit: 1-00000

Emission Unit Description:

Wood furniture cellular surface coating for both seating and case goods.

Building(s): CASE  
CHAIR

**Item 22.2:**

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

Emission Unit: 4-00000

Emission Unit Description:

This unit consists of two boilers venting from the same stack. The E. Keeler boiler produces steam at 18 mmBtu/hr heat input, is fired on natural gas only. The Orr & Sembower boiler produces steam at 21 mmBtu/hr heat input and is fired on natural gas only.

Building(s): CASE  
CHAIR

**Condition 23: Renewal deadlines for state facility permits**  
Effective between the dates of 12/22/2025 and 12/21/2035

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

**Item 23.1:**

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 24: Compliance Demonstration**  
Effective between the dates of 12/22/2025 and 12/21/2035

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

**Item 24.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 24.2:**

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 8  
6274 East Avon-Lima Rd.  
Avon, NY 14414

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2026.  
Subsequent reports are due every 12 calendar month(s).

**Condition 25: Air pollution prohibited**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

**Applicable State Requirement:6 NYCRR 211.1**

**Item 25.1:**

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 26: Compliance Demonstration**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 26.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 26.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Chromium compounds are assigned an Environmental Rating of A. As listed in 6 NYCRR Part 212-2.2 Table 2 High Toxicity Air Contaminant List, the Mass Emission Limit (MEL) is 250 pounds per year. Usage of materials containing Chromium compounds and emissions of Chromium compounds must be recorded and records maintained for 5 years to demonstrate compliance. If the facility is found to be in exceedance of the Chromium compounds MEL, modeling must be conducted and submitted to DEC.

In accordance with DAR-1, the facility must maintain annual emissions less than 250 pounds/year for chromium compounds or perform an analysis to demonstrate compliance

with 212-2.3(b) Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants. The facility must keep record, on a monthly basis, the rolling annual total for Chromium compounds.

The owner or operator is required to meet the short term and annual guideline concentration at the fence line of the facility. The facility must demonstrate this upon exceeding the MEL.

Parameter Monitored: CHROMIUM  
 Upper Permit Limit: 250 pounds per year  
 Monitoring Frequency: MONTHLY  
 Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 27: Emission Point Definition By Emission Unit**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 27.1:**

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

- Emission Unit: 1-00000
  
- Emission Point: 1S001
  - Height (ft.): 30                      Diameter (in.): 34
  - NYTMN (km.): 4714.521    NYTME (km.): 288.43    Building: CASE
  
- Emission Point: 1S003
  - Height (ft.): 30                      Diameter (in.): 34
  - NYTMN (km.): 4714.613    NYTME (km.): 287.401    Building: CASE
  
- Emission Point: 1S004
  - Height (ft.): 30                      Diameter (in.): 34
  - NYTMN (km.): 4714.613    NYTME (km.): 287.401    Building: CASE
  
- Emission Point: 1S006
  - Height (ft.): 30                      Diameter (in.): 34
  - NYTMN (km.): 4714.613    NYTME (km.): 287.401    Building: CASE
  
- Emission Point: 1S007
  - Height (ft.): 30                      Diameter (in.): 34
  - NYTMN (km.): 4714.613    NYTME (km.): 287.401    Building: CASE
  
- Emission Point: 1S010
  - Height (ft.): 30                      Diameter (in.): 34
  - NYTMN (km.): 4714.613    NYTME (km.): 287.401    Building: CASE
  
- Emission Point: 1S011

Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S012		
Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S013		
Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S014		
Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S015		
Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S016		
Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S017		
Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S018		
Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S019		
Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S020		
Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S021		
Height (ft.): 30	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE
Emission Point: 1S023		
Height (ft.): 39	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CHAIR
Emission Point: 1S024		
Height (ft.): 39	Diameter (in.): 34	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CHAIR
Emission Point: 1S029		
Height (ft.): 39	Diameter (in.): 24	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CHAIR

Emission Point: 1S030			
Height (ft.): 39	Diameter (in.): 24		
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CHAIR	
Emission Point: 1S031			
Height (ft.): 16	Diameter (in.): 24		
NYTMN (km.): 4713.	NYTME (km.): 288.	Building: CHAIR	
Emission Point: 1S032			
Height (ft.): 16	Diameter (in.): 24		
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CHAIR	
Emission Point: 1S033			
Height (ft.): 16	Diameter (in.): 24		
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CHAIR	
Emission Point: 1S035			
Height (ft.): 30	Diameter (in.): 34		
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE	
Emission Point: 1S036			
Height (ft.): 30	Diameter (in.): 34		
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CASE	

**Item 27.2:**

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

Emission Unit: 4-00000			
Emission Point: 00C01			
Height (ft.): 77	Length (in.): 44	Width (in.): 44	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CHAIR	
Emission Point: 4B301			
Height (ft.): 77	Length (in.): 44	Width (in.): 44	
NYTMN (km.): 4714.613	NYTME (km.): 287.401	Building: CHAIR	

**Condition 28: Process Definition By Emission Unit**  
**Effective between the dates of 12/22/2025 and 12/21/2035**

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

**Item 28.1:**

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

Emission Unit: 1-00000	
Process: 100	Source Classification Code: 4-02-019-01
Emission Source/Control: 1-100 - Control	
Control Type: FABRIC FILTER	
Emission Source/Control: 1-200 - Process	
Emission Source/Control: 1-300 - Process	

**Item 28.2:**

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

Emission Unit: 4-00000

Process: 400

Source Classification Code: 1-02-009-06

Process Description:

E. Keeler boiler produces steam at 18 MMBtu/hr heat input and the Orr & Sembower boiler produces steam at 21 MMBtu/hr heat input. Both boilers are fired on natural gas only.

Emission Source/Control: 00041 - Combustion

Design Capacity: 18 million Btu per hour

Emission Source/Control: 00051 - Combustion

Design Capacity: 21 million Btu per hour

