

Facility DEC ID: 8543600007

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-5436-00007/00287
Mod 0 Effective Date: 06/21/2023 Expiration Date: 06/20/2033
Mod 1 Effective Date: 01/31/2024 Expiration Date: 06/20/2033

Permit Issued To: GARLOCK SEALING TECHNOLOGIES LLC
1666 DIVISION ST
PALMYRA, NY 14522

Contact: ANTHONY ROUNDING
GARLOCK SEALING TECHNOLOGIES LLC
1666 DIVISION ST
PALMYRA, NY 14522
(315) 597-3922

Facility: GARLOCK SEALING TECHNOLOGIES
1666 DIVISION ST
PALMYRA, NY 14522

Contact: PATRICK WALSH
GARLOCK SEALING TECHNOLOGIES
1666 DIVISION ST
PALMYRA, NY 14522
(315) 597-7325

Description:

Modification 1 to Renewal 0 of the Air State Facility permit for the Garlock Sealing Technologies facility at 1666 Division Street in the Town of Palmyra, Wayne County, New York. The facility produces gaskets, expansion joints, and specialty molded products. Operations include mixing of rubber and plastic components, extrusion, molding, pressing, drying, curing, grinding, coating, product testing, and utilities.

Modification 1 incorporates the addition of the WavePro production process (Process WAV) to Emission Unit 1-GYLON which was previously approved under the Advanced Notification provisions in 6 NYCRR Part 201-5.4(d). The WavePro process is subject to 6 NYCRR Part 212 for Process Emissions Sources. To comply with applicable requirements of 6 NYCRR Part 212, the facility must use the existing Regenerative Thermal Oxidizer (RTO01) to control VOC emissions from the WavePro process.

The High-Pressure Sheet production line (Emission Unit 1-HPSHT) ceased operations and was removed in Spring 2023. This emission unit and associated sources, emission points, and conditions have been removed as part of this modification. Modification 1 also revises the RTO temperature monitoring condition to remove the maximum temperature limit that was included in the prior permit. RTO destruction efficiency is expected to increase with RTO temperature; therefore, this change will not cause an

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increase in facility emissions nor result in less stringent monitoring. Miscellaneous changes to permit conditions have also been made to reflect updated regulations or to improve clarity.

The facility operates two (2) natural gas-fired boilers that are subject to 40 CFR 60, Subpart Dc NSPS for Small Industrial-Commercial-Institutional Steam Generating Units.

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: KIMBERLY A MERCHANT
 6274 E AVON LIMA RD
 AVON, NY 14414-9519

Authorized Signature: _____ Date: ___ / ___ / _____

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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

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DEC GENERAL CONDITIONS

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- 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

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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

Condition 4: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 4.1:

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 4.2:

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

Item 4.3

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

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Condition 5: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 5.1:

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 8: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 8.1:

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

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: GARLOCK SEALING TECHNOLOGIES LLC
1666 DIVISION ST
PALMYRA, NY 14522

Facility: GARLOCK SEALING TECHNOLOGIES
1666 DIVISION ST
PALMYRA, NY 14522

Authorized Activity By Standard Industrial Classification Code:
2822 - SYNTHETIC RUBBER
3053 - GASKETS, PACKING AND SEALING DEVICES

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- 6 1-1 6 NYCRR 212-1.7 (b) (1): Compliance Demonstration
- 7 1-2 6 NYCRR 212-2.3 (b): Compliance Demonstration
- 8 1-3 6 NYCRR 212-2.4 (b): Compliance Demonstration

Emission Unit Level

EU=1-BOILR,Proc=BRL

- 9 3 6 NYCRR 227-1.4 (a): Compliance Demonstration
- 10 4 40CFR 60.48c(g)(3), NSPS Subpart Dc: Compliance Demonstration

EU=1-KLZRS

- 11 7 6 NYCRR 228-2.4 (b) (4): Compliance Demonstration
- 11 8 6 NYCRR 228-2.5 (a): Compliance Demonstration
- 12 9 6 NYCRR 228-2.5 (c): Compliance Demonstration

EU=1-KLZRS,Proc=ADH

- 13 10 6 NYCRR 228-2.4 (a): Compliance Demonstration

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- 16 11 ECL 19-0301: Contaminant List
- 17 12 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 17 13 6 NYCRR Subpart 201-5: Emission Unit Definition
- 19 14 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 19 15 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 19 16 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 20 17 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 21 18 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

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FEDERALLY ENFORCEABLE CONDITIONS

Mod 1/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

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required to operate such device effectively.

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

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

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

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

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial

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Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Visible Emissions Limited
Effective between the dates of 06/21/2023 and 06/20/2033

Applicable Federal Requirement:6 NYCRR 211.2

Item 1.1:

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 1-1: Compliance Demonstration
Effective between the dates of 01/31/2024 and 06/20/2033

Applicable Federal Requirement:6 NYCRR 212-1.7 (b) (1)

Item 1-1.1:

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

| | |
|------------------------|------------------------|
| Emission Unit: 1-GYLON | |
| Process: GYL | Emission Source: RTO01 |

| | |
|------------------------|------------------------|
| Emission Unit: 1-GYLON | |
| Process: WAV | Emission Source: RTO01 |

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

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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To ensure proper operation of the regenerative thermal oxidizer (RTO01) and on-going compliance with the 90 percent (%) control efficiency limit, the RTO temperature must not fall below 1400 degrees F.

As specified under 6 NYCRR 212-1.7(b)(1), to demonstrate compliance with this limit, the facility owner or operator must continuously monitor RTO temperature. RTO temperature readings must be recorded at a minimum of once every 15-minutes. RTO temperature must be monitored using a continuous monitor that is installed, maintained, and calibrated in accordance with the manufacturer's recommendations and a QA program approved by the Department. Alternative monitoring methods are subject to Department approval.

If the RTO temperature falls below the limit above, the facility owner or operator must take immediate corrective action(s) to restore control equipment to its proper operating temperature. The facility owner or operator must record the reason and duration of any deviations from the limit above and any corrective actions taken.

The facility must keep records of the RTO temperature measurements, deviations, corrective actions, and any maintenance or calibration. These records must be kept for a period of at least five years and made available to the Department upon request.

Parameter Monitored: TEMPERATURE
 Lower Permit Limit: 1400 degrees Fahrenheit
 Monitoring Frequency: CONTINUOUS
 Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-2: Compliance Demonstration
Effective between the dates of 01/31/2024 and 06/20/2033

Applicable Federal Requirement: 6 NYCRR 212-2.3 (b)

Item 1-2.1:

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

| | |
|------------------------|------------------------|
| Emission Unit: 1-GYLON | |
| Process: GYL | Emission Source: RTO01 |

| | |
|------------------------|------------------------|
| Emission Unit: 1-GYLON | |
| Process: WAV | Emission Source: RTO01 |

Regulated Contaminant(s):

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CAS No: 064742-47-8

DISTILLATES (PETROLEUM), HYDROTREATED LIGHT

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Facility process emissions of mineral spirits (petroleum distillates) have been assigned an Environmental Rating of B by the Department. Per Table 4 to 6 NYCRR 212-2.3(b), air contaminants that have been assigned an Environmental Rating of B and have an Emission Rate Potential greater than 10 lbs per hour must meet an air cleaning requirement of 90 percent (%).

To satisfy this requirement the facility owner or operator must install and operate a regenerative thermal oxidizer (RTO01) with a VOC destruction efficiency greater than 90% to control mineral spirits emissions from Processes GYL and WAV. Confirmatory testing completed in 2019 demonstrated that RTO01 achieved an VOC destruction efficiency of 98.5%.

Confirmatory testing for the RTO must be completed once every 10 years or upon request by the Department. The VOC destruction efficiency will be determined using EPA Method 25A (or an alternative approved by the Department). In accordance with 6 NYCRR 202-1, a test protocol must be submitted to the Department at least 30 days prior to conducting the test. A test report must be submitted to the Department in triplicate within 60 days of completing the test.

Records of completed tests and test protocols must be maintained for a period of at least five years and made available to the Department upon request.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 90 percent reduction

Reference Test Method: EPA Method 25A

Monitoring Frequency: ONCE EVERY TEN YEARS

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-3: Compliance Demonstration

Effective between the dates of 01/31/2024 and 06/20/2033

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

Item 1-3.1:

The Compliance Demonstration activity will be performed for the facility:

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The Compliance Demonstration applies to:

Emission Unit: 1-EXPJT

Emission Unit: 1-GYLON

Emission Unit: 1-KLZRS

Emission Unit: 1-RBRMX

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

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

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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

Condition 3: Compliance Demonstration

Effective between the dates of 06/21/2023 and 06/20/2033

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

Item 3.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BOILR

Process: BRL

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Item 3.2:

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 subject to this Subpart 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 annually. 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: ANNUALLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration
Effective between the dates of 06/21/2023 and 06/20/2033

Applicable Federal Requirement: 40CFR 60.48c(g)(3), NSPS Subpart Dc

Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BOILR

Process: BRL

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility will maintain monthly natural gas usage records via gas fuel delivered to the facility each calendar year from the local utility. All records required shall be maintained for a period of two years following the date of such record.

Monitoring Frequency: MONTHLY

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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Condition 7: Compliance Demonstration
Effective between the dates of 06/21/2023 and 06/20/2033

Applicable Federal Requirement: 6 NYCRR 228-2.4 (b) (4)

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-KLZRS

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

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

When performing the removal of a commercial or industrial adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment, the facility owner or operator must:

1. use an enclosed cleaning system, or an equivalent cleaning system as determined by the applicable test method identified in 6 NYCRR Part 228-2.6(h);
2. use a solvent with a VOC content less than or equal to 70 grams per liter; and
3. soak all parts containing dried adhesive in a solvent with a composite vapor pressure, excluding water and exempt compounds, less than or equal to 9.5 mm Hg at 20 degrees Celsius. The solvent and any soaking parts must be kept in a closed container at all times except when adding or removing parts from the container.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: SOLVENT

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 70 grams per liter

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration
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applicable rather than an adhesive-to-listed-substrate limit; and

(2) if an adhesive is used to bond dissimilar substrates together, the applicable substrates category with the highest VOC content shall be the limit for such use.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: ADHESIVE

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 850 grams per liter

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

STATE ONLY ENFORCEABLE CONDITIONS

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

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

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

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

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

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with 6 NYCRR Part 616 - Public Access to Records.
Facility owners and/or operators must submit the records
required to comply with the request within sixty working
days of written notification by the Department.

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

Any person who owns and/or operates stationary sources
shall operate and maintain all emission units and any
required emission control devices in compliance with all
applicable Parts of this Chapter and existing laws, and
shall operate the facility in accordance with all
criteria, emission limits, terms, conditions, and
standards in this permit. Failure of such person to
properly operate and maintain the effectiveness of such
emission units and emission control devices may be
sufficient reason for the Department to revoke or deny a
permit.

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 11: Contaminant List

Effective between the dates of 06/21/2023 and 06/20/2033

Applicable State Requirement: ECL 19-0301

Item 11.1:

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

CAS No: 064742-47-8

Name: DISTILLATES (PETROLEUM), HYDROTREATED LIGHT

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

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Condition 12: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 06/21/2023 and 06/20/2033

Applicable State Requirement:6 NYCRR 201-1.4

Item 12.1:

(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 13: Emission Unit Definition
Effective between the dates of 06/21/2023 and 06/20/2033

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 13.1(From Mod 1):

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

Emission Unit: 1-EXPJT

Emission Unit Description:

The expansion joint department includes the fabrication of expansion joint forms and product including form assembly; sheet, cord, and adhesive wrapping to assemble product; and oven curing of product.

Building(s): 24

Item 13.2(From Mod 1):

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

Emission Unit: 1-GYLON

Emission Unit Description:

This emission unit includes two (2) process lines for the production of Gylon and WavePro products. Broth production lines are located in the Gylon Building.

Gylon products are produced by mixing raw materials including powders, pigments, clays and solvents into a dough. The dough is placed in calendaring machines which produce sheets that are then dried in electric ovens. VOC emissions from the Gylon production process are controlled using a regenerative thermal oxidizer (RTO).

WavePro products are produced by mixing raw materials where are processed and dried in electric ovens. VOC emissions from the WavePro process are controlled using a RTO.

Building(s): 202

Item 13.3(From Mod 1):

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

Emission Unit: 1-KLZRS

Emission Unit Description:

The pre-treatment and adhesive coating of metal springs or rings prior to rubber assembly in the facility's Klozure Building operations.

Building(s): 201

Item 13.4(From Mod 1):

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

Emission Unit: 1-RBRMX

Emission Unit Description:

Rubber mixing conducted in Banbury mixer. Raw materials are loaded and mixed in batch mode in the mixer to produce rubber.

Building(s): 15

Item 13.5(From Mod 0):

Permit ID: 8-5436-00007/00287

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

Emission Unit: 1-BOILR

Emission Unit Description:

Two boilers (14.645 MM Btu/hr and 14.645 MM Btu/hr)
firing natural gas to provide process steam.

Building(s): 5b

Condition 14: Renewal deadlines for state facility permits
Effective between the dates of 06/21/2023 and 06/20/2033

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

Item 14.1:

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 15: Compliance Demonstration
Effective between the dates of 06/21/2023 and 06/20/2033

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

Item 15.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 15.2:

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: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 16: Air pollution prohibited
Effective between the dates of 06/21/2023 and 06/20/2033

Applicable State Requirement:6 NYCRR 211.1

Item 16.1:

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

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property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

**Condition 17: Emission Point Definition By Emission Unit
Effective between the dates of 06/21/2023 and 06/20/2033**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 17.1(From Mod 1):

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

Emission Unit: 1-GYLON

Emission Point: 20201

Height (ft.): 37 Diameter (in.): 12
NYTMN (km.): 4770.008 NYTME (km.): 318.792 Building: 202

Emission Point: 20202

Height (ft.): 18 Diameter (in.): 6
NYTMN (km.): 4770.008 NYTME (km.): 318.734 Building: 202

Item 17.2(From Mod 0):

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

Emission Unit: 1-BOILR

Emission Point: 05B01

Height (ft.): 44 Diameter (in.): 24
NYTMN (km.): 4770.932 NYTME (km.): 318.871 Building: 5b

Emission Point: 05B02

Height (ft.): 44 Diameter (in.): 24
NYTMN (km.): 4770.931 NYTME (km.): 318.875 Building: 5b

Item 17.3(From Mod 0):

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

Emission Unit: 1-EXPJT

Emission Point: 02401

Height (ft.): 34 Diameter (in.): 16
NYTMN (km.): 4770.788 NYTME (km.): 318.95 Building: 24

Emission Point: 02402

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| | | |
|-----------------------|----------------------|--------------|
| Height (ft.): 32 | Diameter (in.): 14 | |
| NYTMN (km.): 4770.795 | NYTME (km.): 318.013 | Building: 24 |
| Emission Point: 02405 | | |
| Height (ft.): 26 | Diameter (in.): 12 | |
| NYTMN (km.): 4770.792 | NYTME (km.): 319.026 | Building: 24 |
| Emission Point: 02406 | | |
| Height (ft.): 34 | Diameter (in.): 14 | |
| NYTMN (km.): 4770.809 | NYTME (km.): 318.954 | Building: 24 |

Item 17.4(From Mod 0):

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

| | | |
|------------------------|----------------------|---------------|
| Emission Unit: 1-KLZRS | | |
| Emission Point: 20101 | | |
| Height (ft.): 34 | Diameter (in.): 30 | |
| NYTMN (km.): 4770.95 | NYTME (km.): 318.643 | Building: 201 |
| Emission Point: 20102 | | |
| Height (ft.): 38 | Diameter (in.): 36 | |
| NYTMN (km.): 4770.949 | NYTME (km.): 318.633 | Building: 201 |

Item 17.5(From Mod 0):

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

| | | |
|------------------------|---------------------|--------------|
| Emission Unit: 1-RBRMX | | |
| Emission Point: 01501 | | |
| Height (ft.): 30 | Diameter (in.): 16 | |
| NYTMN (km.): 4770.821 | NYTME (km.): 318.95 | Building: 15 |

Condition 18: Process Definition By Emission Unit

Effective between the dates of 06/21/2023 and 06/20/2033

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1(From Mod 1):

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

| | |
|--|---|
| Emission Unit: 1-EXPJT | |
| Process: EXJ | Source Classification Code: 3-08-006-99 |
| Process Description: | |
| Expansion joints and/or expansion joint materials are cured in ovens prior to final assembly/shipment. | |

Emission Source/Control: O2405 - Process

Emission Source/Control: O2406 - Process

Emission Source/Control: OVN06 - Process

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Facility DEC ID: 8543600007

Emission Source/Control: OVN07 - Process

Item 18.2(From Mod 1):

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

Emission Unit: 1-GYLON

Process: GYL

Source Classification Code: 3-08-006-99

Process Description:

Gylon products are produced by mixing raw materials including powders, pigments and solvents into a dough. The dough is placed in calendering machines which produce sheets that are dried in electric ovens. VOC emissions are controlled using a regenerative thermal oxidizer (RTO).

Emission Source/Control: DCL02 - Control

Control Type: FABRIC FILTER

Emission Source/Control: RTO01 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: FIL01 - Process

Emission Source/Control: MIX01 - Process

Emission Source/Control: OVN01 - Process

Emission Source/Control: OVN02 - Process

Emission Source/Control: OVN03 - Process

Emission Source/Control: OVN04 - Process

Emission Source/Control: OVN05 - Process

Item 18.3(From Mod 1):

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

Emission Unit: 1-GYLON

Process: WAV

Source Classification Code: 3-08-006-99

Process Description:

WavePro products are produced by mixing raw materials which are processed and dried in electric ovens. VOC emissions are controlled using a regenerative thermal oxidizer (RTO).

Emission Source/Control: RTO01 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: OVN08 - Process

Emission Source/Control: OVN09 - Process

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Facility DEC ID: 8543600007

Item 18.4(From Mod 1):

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

Emission Unit: 1-KLZRS
 Process: ADH Source Classification Code: 4-02-007-01
 Process Description: Spring material is coated with an adhesive.

Emission Source/Control: FLT01 - Control
 Control Type: FABRIC FILTER

Emission Source/Control: PHS01 - Process

Emission Source/Control: SPY01 - Process

Emission Source/Control: SPY02 - Process

Emission Source/Control: SPY03 - Process

Emission Source/Control: SPY04 - Process

Item 18.5(From Mod 1):

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

Emission Unit: 1-KLZRS
 Process: PHS Source Classification Code: 3-09-001-98
 Process Description:
 The phosphate/line heating bath is used to clean, degrease, and phosphatize metals prior to application of adhesives.

Emission Source/Control: PHS01 - Process

Item 18.6(From Mod 1):

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

Emission Unit: 1-RBRMX
 Process: BRM Source Classification Code: 3-08-006-99
 Process Description:
 Rubber mixing conducted in Banbury mixer. Raw materials are loaded and mixed in batch mode in the mixer to produce rubber.

Emission Source/Control: DCL01 - Control
 Control Type: FABRIC FILTER

Emission Source/Control: BBM01 - Process

Item 18.7(From Mod 0):

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

Emission Unit: 1-BOILR

Permit ID: 8-5436-00007/00287

Facility DEC ID: 8543600007

Process: BRL

Source Classification Code: 1-02-006-02

Process Description: Natural gas combustion in two (2) boilers

Emission Source/Control: BRL01 - Combustion

Emission Source/Control: BRL02 - Combustion

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Facility DEC ID: 8543600007